

Relay Hawaii FCC Certification Renewal and Supporting Documents

Introduction

Relay Hawaii, a program under the State of Hawaii Public Utilities Commission ("Hawaii PUC"), has prepared the following narrative and attached appendices to comply with the FCC TRS Certification Renewal Application, specifically in response to the FCC Public Notice DA 17-697, CG Docket No. 03-123 released on July 19, 2017. Included in the Public Notice are the minimum mandatory FCC Telecommunications Relay Service (TRS) requirements under 47 C.F.R. §64.604 and §64.606. A copy of this Public Notice and these mandatory requirements are attached as Appendix A. Relay Hawaii prepared this TRS Certification Renewal Application with the assistance of Sprint Accessibility (formerly Sprint Relay).

The Hawaii PUC contracted with Sprint Accessibility to provide Telecommunications Relay Service effective to provide operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606. Included with this TRS Certification Renewal Application is a copy of the Certification of Operation of TRS that was issued September 2015. All of the minimum mandatory TRS requirements are listed in **Appendix B**. Please note that although Sprint Accessibility provides Internet Protocol (IP) and Captioned telephone (CapTel) web-based services, Relay Hawaii does not contract to provide these services in the State of Hawaii, nor is Relay Hawaii responsible for oversight of IP and VRS or to other Internet- or web-based relay services.

The FCC has requested that each FCC TRS Certification Renewal application respond to the minimum mandatory FCC TRS requirements for providing TRS and that each state includes procedures and remedies for enforcing any requirements imposed by state programs. Additionally, the FCC requested that several exhibits such as outreach presentations, promotional items, consumer training materials, and consumer complaint logs be included with the information provided.

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Operational Standards

A.1 Communication Assistants (CAs)

§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities.

CA Employment Standards

The State of Hawaii Public Utilities Commission ("Hawaii PUC") contracts with Sprint Accessibility to provide the hiring, training and oversight of Communications Assistants (CAs) for Relay Hawaii. Sprint Accessibility has established a successful procedure to attract qualified applicants for TRS CA positions. Sprint Accessibility's Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging position as a CA and ensures all communications are of the highest quality. Employees continue to expand their knowledge of Relay and the importance of providing quality services to the consumers they serve throughout their employment as a CA. CAs are required to have a high school diploma or GED, which ensures that the applicant has at least a 12th grade level of English grammar and spelling skills, the ability to type 60 words-per-minute (wpm) on an auditory-based test, clear articulation and an intelligible, pleasant speaking voice.

Preference is given to CA applicants with TRS experience, knowledge of American Sign Language (ASL), or experience working with individuals who are deaf, hard of hearing or have a speech disability.

All applicants for CA positions are required to submit an employment application that details the applicant's educational and employment history. After an applicant's educational history, employment history and typing test results are reviewed; a determination is made as to whether the applicant meets the minimum CA requirements.

A human resources representative will then screen potential candidates through face-to-face and telephone interviews to evaluate the applicant's communication skills, including English grammar, diction and speech clarity, sensitivity to issues of customer service, integrity and confidentiality, and overall suitability for the job. Those applicants who do not pass the HR screening interview will not be considered for employment.

Sprint Accessibility TRS CA applicants are required to pass a valid and unbiased 12th-grade level spelling test to be considered for employment. Sprint Accessibility TRS CA applicants must pass a valid unbiased 12th-grade level grammar test to be considered for employment.

Once the applicant passes the HR screening interview, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. These dimensions include sensitivity to customers and issues of confidentiality.

If the Supervisor recommends the applicant for employment, the applicant must pass a drug screen and a background investigation of educational, work and criminal histories.

This process ensures only qualified applicants are hired to work at Sprint Accessibility centers as a CA.

Sprint Accessibility provides an enhanced VCO service called Captioned Telephone (CapTel) Services. Sprint Accessibility requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job. Sprint Accessibility ensures all CapTel Operators are sufficiently trained to meet the needs of CapTel users. Trainees must demonstrate adequate skill

level in all aspects of call processing prior to graduation from training. CapTel Relay Trainees must also demonstrate a strong proficiency in the primary required skill-set of re-voicing for CapTel calls.

- CapTel Operator Trainees spend 2 to 3 weeks training in a classroom setting.
- There is a final proficiency exam that must be passed in order to move into a live call environment.
- Upon completion of classroom training, CapTel Operators are scheduled for one-week of transition training, while being monitored and supported by another CapTel Operator or an Instructor.
- All CapTel Operators must continue to qualify for live call handling each month.
- Sprint Accessibility CapTel Operators are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.
- Each CapTel Operator is evaluated on a minimum of one call each shift.
- There is also a monthly test that each CapTel Operator must pass in order to remain qualified to caption live calls.

§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Relay Hawaii, through their contract with Sprint Accessibility, has shown Sprint Accessibility CAs have competent skills in typing, grammar, spelling, interpretation of written ASL and familiarity with hearing and speech disability cultures, languages and etiquette. Sprint Accessibility requires all CAs to possess clear and articulate voice communications. CAs are given five written and three hands-on performance evaluations demonstrating the ability to process calls. Sprint Accessibility CAs must demonstrate Relay skill level in all aspects of call processing prior to graduation from training. CAs must demonstrate their ability to:

- Sprint Accessibility CAs must type 60 wpm prior to taking live calls and post training must demonstrate the ability to maintain a minimum typing speed of 60 wpm on an auditory test.
- Sprint Accessibility's diversified culture training program provides the CA with information about understanding TRS users including deaf users and their culture, history and communication needs. Sprint Accessibility's diversified culture program incorporates training includes the characteristics and of hard-of-hearing and late deafened users, deaf/blind and speech disabled users.
- Demonstrate a professional and courteous phone image
- Process calls using live training terminals in an efficient and knowledgeable manner
- Role-play scenarios written in varying levels of ASL

Sprint Accessibility provides an extensive process for hiring CAs who provide Speech to Speech (STS). CA applicants must successfully achieve the following:

- Six months of employment as a CA
- Recommendation and/or approval from supervisor or manager
- Attend and complete speech to speech specialized STS training program including a written evaluation.
- Proficiency in all areas of Relay call processing including grammar, enunciation and vocabulary
- Hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test.

STS applicants who meet these qualifications receive additional training specifically on STS. Sprint Accessibility's STS training is delivered by individuals with professional experience related to Speech Disabilities and/or consumer experts and is based on adult learning theories.

STS applicants who meet all qualifications for the STS training program receive eight hours of classroom training specifically on STS. Sprint Accessibility's STS training program has been developed based on direct experience and consultation with Dr. Bob Segalman obtained during the initial STS trial conducted along with eight years of experience processing STS calls.

The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call including retention of information at the user's request and verification of what is said to verify accuracy.

The STS training outline is displayed in the following figure:

STS TRAINING OUTLINE						
Sprint Accessibility Values and Goals						
Training Agenda						
 Objectives / Training Outline 	Speech-Disabilities					
 Introduction and History 	 Attributes of Speech-to-Speech Relay CAs 					
Video	 Speech-to-Speech verses Traditional Relay 					
 Service Description 	 FCC Requirements 					
 Characteristics of Customers 	Speech-to-Speech Variations					
Stereotypes	 Assessment 					
Work Performance Components						
 Basic Call Processing 	 Confidentiality 					
Call set up	Transparency					
 Customer Database 	 Personal Conversations 					
Frequently Dialed Numbers	 Developmental Skill Practice 					
 Customer Requests 	Audio					
 Emergency Call Processing 	 Observation 					
Participation						
CA training	 Call Focus 					
 Taking over calls – 15 minute 	Teamwork – support peer					
 CA work performance 						
Confidentiality and Transparency						
 Discuss call speech patterns 	Unacceptable to:					
 Discuss techniques customer uses 	 Have conversation regarding information 					
 Have two CAs on one call, if necessary or 	discussed on calls					
customer requests.	 Discuss customers in general 					

All CapTel Operators are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel Operator training provides familiarity with hearing, deaf, and speech-disabled cultures.

Personnel supporting CapTel have the requisite experience, expertise, skills, knowledge, training, and education to perform CapTel Services in a professional manner. CapTel Operator Trainees are screened on several skill sets to be considered for hire. Several tests are administered to evaluate for skills in the following:

- Spelling
- Pronunciation
- Enunciation
- Reading Ability
- Vocabulary

• Error Recognition - CapTel Operators must be able to recognize a mistake in voice-recognition and be able to appropriately correct errors while on a call.

A captioned telephone user does not type during CapTel calls; therefore it is not necessary for the Operator to interpret typewritten ASL.

CA Quality Assurance Programs

Sprint Accessibility Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure consistent quality is maintained throughout the TRS network of Relay centers. The Sprint Accessibility Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and discuss concerns and how to address them. The training team is located in five Relay Centers across the country. This team along with the support of the Location Managers, Supervisors, and CAs has just one goal: to provide excellent service to our customers. In addition, Sprint Accessibility listens to customer's feedback and takes proactive steps to implement suggestions and feedback. Sprint Accessibility does not develop training and consumer education programs for the Telecommunications Relay service alone. Sprint Accessibility contracts with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities to jointly develop and present training all TRS programs.

§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Transmission of 60 WPM

The Hawaii PUC contracts with Sprint Accessibility to provide a comprehensive Quality Assurance program focusing strictly on typing speed and accuracy. As a part of this program, Sprint Accessibility conducts pre-employment testing and internal testing (quarterly) using a 5-minute oral-to-type test that simulates actual working conditions and the Relay environment. Internal testing on typing speeds demonstrated that Sprint Accessibility's CAs typed an average of 83.9 wpm, with at least 95 percent accuracy. In fact almost a third of Sprint Accessibility's CAs type over 90 wpm!

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified VRS interpreters

The Hawaii PUC does not contract to provide VRS services, nor is the state responsible for the oversight of VRS. As of January 2012, Sprint Accessibility no longer provides VRS services.

§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

In-Call Replacement of CAs

Through their contract with Sprint Accessibility, Relay Hawaii exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice at Sprint Accessibility, calls are not taken over unless it is absolutely necessary to do so. Sprint Accessibility CAs are trained to use on screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the TRS (15 minutes with STS) inbound customer, a CA may be

relieved if it is appropriate. The only situations in which a CA would transition during a call prior to the FCC minimum standard of 10 minutes include:

- The customer requests a CA of the opposite gender or different CA,
- End user verbal abuse or obscenity towards the CA,
- Call requires a specialist (STS, Spanish, other),
- CA illness,
- At the request of the customer for any reason, and/or
- CA becomes aware of a conflict of interest such as identifying callers as friends or family.

In addition, there are situations which may require a CA to transition the call to a different CA, which is only approved after the CA has remained on the call longer than the FCC minimum standard of 10 or 15 minutes (for STS calls). These include:

- Shift change, and/or
- CA fatigue normally as a result of a call in progress more than 30 minutes with difficult call content or speed or 60 minutes or more of an average call.
- If transition of CAs is unavoidable, the change occurs with minimal disruption to either Relay participant including the following:
 - Sprint Accessibility attempts to honor any requests for a specific gender during call transitions.
 - o The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

As stated in section §64.604 (a)(1) (v), Relay Hawaii honors the requests of all callers when they request a specific CA gender. Relay users may request a specific CA gender through the Customer Profile or a per-call basis directly with the CA. The transfer of the CA to the requested gender occurs as soon as one is available. This requirement has been waived by the FCC for CapTel CAs.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

All conversations relayed between voice and TTY callers are transmitted in real-time. Relay Hawaii uses Sprint Accessibility's Phoenix software, which provides tools and enhancements designed to allow conversations to be transmitted in real time, including the following:

- Automated answer
- CA-initiated macros (44 macros)
- Function Keys (85 separate function keys)
- System-initiated macros
- On-line help panel
- Tone of voice pre-approved descriptions (almost 100)
- Automatic Error Correction Library (615 words)
- Background descriptions (over 250)

All of these features are available in all languages including English and Spanish.

CapTel is a transparent service. CapTel CAs transmit audio and captioned text conversations from the voice caller to the CapTel user in real time. Since the CapTel user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Context

§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Confidentiality Policies and Procedures

As stated previously, the Hawaii PUC contracts with Sprint Accessibility to oversee all TRS CAs, including CapTel CAs for the State of Hawaii.

In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

The only exception to this policy relates to STS calls. Relay Hawaii STS Relay Agents may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

Relay Hawaii's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint Accessibility strictly enforces confidentiality policies in the Center, which include the following:

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Accessibility Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Accessibility Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Accessibility Center's Agreement Regarding Confidential Customer Information requires CAs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

Relay Hawaii CapTel CAs must comply with the same rules TRS follows regarding confidentiality. The CapTel confidentiality form is similar to TRS.

Information obtained during a CapTel call should not be shared with any person except a member of the CapTel management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.

Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, CapTel in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

A CapTel agent may have problems, complaints or stress from handling the call. The CA may ask to speak to a supervisor or other member of management (as long as it was not their call) in a private area.

The success of CapTel depends on quality and complete confidentiality. Since consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all CAs understand and abide by the confidentiality policy. Any CA who breaks this policy will be disciplined, up to and including termination.

STS Limited Exception of Retention of Information

At the request of a caller, Relay Hawaii STS CAs will retain information from a call in order to facilitate the completion of consecutive calls. STS CAs may utilize the TRS system designed electronic scratchpad to aid the CA during the processing to a call or subsequent calls. No information is kept after the inbound call is released from the CA position.

§64.604 (2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Verbatim Relay and the Translation of ASL

Relay Hawaii CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

STS and TRS Training: Sprint Accessibility puts control of the call with the users.

- CAs accept their being involved only to the point of facilitating communication as a "human telephone wire."
- CAs understand the relay user is to remain in control of the call.
- CAs do not make decisions or comments on behalf relay users.
- The user controls the call progress and content of the conversation.
- CAs re-voice/relay verbatim what is spoken, typed or heard.

At the request of the relay user, Relay Hawaii CAs will translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten ASL during initial training and throughout a CA's employment. In order to successfully complete initial training, the CA must demonstrate competent skills to accurately reflect the TTY user's intent and the CA's role in the Relay process. CA trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80 percent or better before being allowed to complete training and process Relay calls. After initial training, each CA is provided with an ASL workbook. This workbook is completed by the CA and returned to the Supervisor. The Supervisor and CA together review the workbook and the CA's ability to translate ASL to conversational English. The CA keeps this manual for future reference. A CA continues to be evaluated on translation skills through individualized monthly surveys.

Relay Hawaii CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim. The State of Hawaii does not have oversight of VRS services and does not contract with providers to process VRS calls, and is therefore exempt from ensuring VRS interpreters maintain confidentiality.

STS Facilitation of Communication

Relay Hawaii STS CAs will facilitate communication without interfering with a caller's independence. They do not counsel, advise or interject personal opinions. Relay Hawaii STS CAs have received training on many techniques to clarify the STS user's message if the meaning or context is unclear. Sprint Accessibility understands each STS user may also find one technique to be most comfortable. Sprint Accessibility STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible.

Relay Hawaii STS CAs will not guess what the STS user is saying and will request clarification when unsure. When unsure of the meaning or context, the STS CAs will ask the speech disabled caller to repeat or clarify – especially if the meaning or context is unclear. Emphasis is placed on the intent and spirit of the message.

When necessary, STS CAs respectfully engage in open dialogue with the STS user while maintaining focus on the intent of the call. STS CAs may use many multiple tactics to clarify a STS user's message. Many times STS users have a preference on which tactic works best for him or her. When the STS user has a preference, the STS CA will use that tactic. Otherwise the STS CA may clarify unsure including the following:

- STS CAs may simply ask STS user to repeat the word or phrase
- STS CAs may ask "yes" or "no" questions
- STS CAs may ask the STS user to use the word in another sentence
- STS CA may ask the STS user to provide a word that rhymes with the misunderstood word
- STS CA may ask the user to spell the word

To ensure STS CAs follow established call processing procedures, STS CAs are evaluated through individualized monthly surveys, tested randomly through the test call process, provided with customer feedback when available and observed by supervisors who are available in the STS CA work area to monitor performance. If a development area is identified in any area of call processing the STS CA will receive specific feedback and additional training. If the STS CA performance does not demonstrate improvement, progressive discipline up to and including termination may occur.

A.3 Types of Calls

§64.604 (3) (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

Relay Hawaii provides 24x7 TRS for standard (voice), Text Telephone (TTY), wireless, or personal computer users to place local, intrastate, interstate, and international calls. Relay Hawaii also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing Relay Hawaii retain full control of the length and number of calls placed anytime through relay.

Relay Hawaii CapTel CAs are currently waived by the FCC for outbound calls because the CapTel CA is not involved in the call set up and cannot refuse the call CapTel users dial sequential calls directly therefore it is not possible for a CapTel CA to refuse sequential calls or limit length of calls.

Relay Hawaii CapTel CAs are not waived by the FCC for inbound calls to a CapTel user made through a TRS facility. However, if a call is made directly to the captioned telephone access number, no set up is involved and the CapTel CA cannot refuse to call.

§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

The following information is applicable for the timeframe through May 31, 2017:

Relay Hawaii, through Sprint Accessibility, works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. Sprint Accessibility processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Relay Hawaii will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

All TRS and CapTel users will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing will occur within 60 days of the call date. Relay Hawaii gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. Relay Hawaii works with the LECs and IXCs to compile and make available to all TTY or CapTel users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay.

The following information is applicable beginning June 1, 2017:

As part of our overall corporate technology evolution to provide all of our customers with communications delivered in a cost-effective, high performance manner, Sprint has already

decommissioned aging infrastructure whose upkeep costs our customers more. For all of our Relay users, this also means simpler and guicker call set-up.

In August of 2016, Sprint received a waiver of end user selection of carrier from the FCC. As a result, Sprint is offering *domestic and international calling at no charge* with no long distance fees or long distance call billing for all TRS and CTS users through Relay Hawaii service. Sprint's optimal approach provides less cost to the end user, fewer billable minutes to the State, greater functional equivalence, and fewer customer complaints.

Sprint's approach as a global telecommunication provider includes the following benefits for Relay Hawaii and its end users:

- Correctional Facilities: Sprint will process calls from inmates at correctional facilities without charge. Please note, inmate calling services (ICS) providers may assess fees directly to relay users as is done for traditional phone users (i.e., non-relay callers).
- Payphones: Sprint will *provide domestic and international calling at no charge* for Relay Hawaii callers using payphones.
- International Locations: Sprint will provide <u>outbound international calling at no charge</u> for TRS and CTS users. Inbound access is available with customers being charged.
- **Directory Assistance**: Sprint is offering <u>access to Directory Assistance at no charge</u> through for Relay Hawaii Service.
- Pay Per Call Services: Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

§64.604 (3) (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

The following information is applicable for the timeframe through May 31, 2017:

If a long distance provider declines to complete a call because credit authorization is denied, Sprint Accessibility will relay the message verbatim to the relay user and follow the user's instructions.

The following information is applicable beginning June 1, 2017:

Due to the waiver described in the previous question, long distance billing is no longer applicable. Sprint is offering <u>domestic and international calling at no charge</u> with no long distance fees or long distance call billing for all TRS and CTS users through Relay Hawaii service.

§64.604 (3) (iv) Relay services shall be capable of handling pay-per-call calls.

The following information is applicable for the timeframe through May 31, 2017:

Sprint Accessibility was the first provider to process pay-per-calls, beginning in 1996. Callers to Relay Hawaii access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone. Because 900 blocking information is not available with CapTel phones, CapTel users who wish to place pay-per-calls from the CapTel phone must update their Customer Profile form to allow these calls.

The following information is applicable beginning June 1, 2017:

Due to the previously described waiver, Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

Relay Hawaii provides access to all available relay call types. Through the state's contact with Sprint Accessibility, the state meets and in some cases exceeds the requirements for text-to-voice, voice-to-text, VCO, two-line VCO, VCO-to-TTY, VCO-to-VCO, HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. Standard services provided by Relay Hawaii are:

- Text-to-Voice (TTY to Voice)
- Voice-to-Text (Voice to TTY)
- VCO Attribute-Based Routing
- VCO with Privacy/No GA
- VCO Branding
- Standardized or personalized VCO call announcement and explanation
- Two-Line VCO
- VCO-to-HCO
- VCO-to-TTY
- VCO-to-VCO
- Reverse Two-Line VCO
- Voice Call Progression
- HCO with Privacy
- HCO Branding
- Standardized or personalized HCO call announcement and explanation
- Two-Line HCO
- Reverse Two-Line HCO
- HCO-to-VCO
- HCO to TTY

Except where waived by the FCC, Relay Hawaii CapTel users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. STS and HCO calls are also waived.

§64.604(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Call Release Functionality

Relay Hawaii's TTY Call Release, also known as TTY-to-TTY call set-up, is fully in compliance with FCC standards. Once the CA has both TTY parties on line, the CA releases the call and the conversation is removed from the CA's screen, ensuring confidentiality. TTY callers are then able to conduct a conversation with their called party (TTY) without an intermediary remaining on the line.

Relay Hawaii adheres to the FCC's 2nd Report and Order rule, and when the call is signed off or 'released' by the CA, the call ceases to be a Relay call and is no longer subject to the per-minute reimbursement. With 2-Line CapTel service, a CapTel user can release or receive captions at any time during a call.

Speed Dialing Functionality

Relay Hawaii's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their TRS customer profile. Customers who wish to store more numbers can simply register multiple Customer profiles, which translate to an unlimited number of entries. When the customer calls into the center, the customer can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the CA will dial the associated 10-digit telephone number without delay. The frequently dialed number entry can be sorted by name or number. The CapTel Consumer Premises Equipment is equipped with the ability to program in three speed dial numbers and a recently dialed number.

Three-Way Calling

Relay Hawaii provides three-way calling capability, in which the voice or STS Relay users through TRS (if the customer has purchased this feature from his/her LEC) can use this feature to tie the third party directly into the conversation or to tie the third party in by making a second call to the Relay center. Relay users who have purchased Three-Way calling or conference calling capability from his/her LEC can use this feature when placing a call through Relay Hawaii. This feature allows the user to place the call to the Relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method.

TTY users may also use the relay to conference in another TTY user on the line. The original TTY user requests to place a call to the voice-called party. It then becomes a conversation between two TTY customers and one Voice customer. This process also would apply if there were two voice customers and one TTY user on the line.

Relay Hawaii provides three-way calling for CapTel users that is in full compliance with FCC requirements. Two-line CapTel users are able to host, join or be added to any three-way call in the same manner as traditional telephone users. One-line CapTel users are able to join any three-way call in progress. In order to be added on, the host of the three-party call would simply dial the national CapTel number and enter the CapTel user's telephone number. CapTel users are also able to participate in a conference bridge to speak to three or more individuals.

§64.604(3)(vii) Voicemail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

Relay Hawaii, through Sprint Accessibility, provides an advanced Phoenix platform which contains CA-generated macros (e.g., pre-programmed phrases) which allow the CA to press a "hot key" to alert TRS users of the presence of a recorded message and/or interactive menu. Sprint Accessibility's hot key sends text to the user which says "(RECORDING)." Sprint Accessibility's hot keys are available in all supported languages, including English and Spanish.

Relay Hawaii has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted from the CA's screen, after the call has

ended. The only information that is retained is information in the Call Detail Record necessary to bill the call.

Relay Hawaii does not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. Sprint Accessibility's sophisticated Phoenix feature incorporates "function keys" allowing the CA to complete standard tasks with a combination of two-keys (or mouse clicks). As a result, many calls involving recordings can be completed without having to redial using Sprint Accessibility's recording functionality. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call over an ultra-watts line so the end user is not imposed charges for additional calls.

Relay Hawaii CapTel users are able to hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.

§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Retrieving Answering Machine and Voice Mail Messages

Relay Hawaii has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through Sprint Accessibility's Phoenix platforms, CAs are able to retrieve and relay voice messages for TTY users and TTY messages for voice users.

When a user requests the CA to retrieve messages from a voice mail system or PBX mailbox, the CA will follow the following process:

- The CA will inform the caller that an answering machine has been reached.
- If the caller has provided instructions, such as access codes will follow the user's instructions. Sprint Accessibility will use the touch-tone capability embedded in Sprint Accessibility's Phoenix software to enter access codes or system commands to retrieve new messages, play all messages, save messages, and/or delete messages (depending on customer instructions).
- If necessary, Relay Hawaii CAs uses advanced recording technology to slow down the playback of the messages. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voicemail, and recordings which redials the call so the end user is not imposed charges for additional calls. The following information is applicable for the timeframe through May 31, 2017: If the CA needs to redial local calls are free, if the call is long distance the customer is only charged long distance calls for the first call. The following information is applicable beginning June 1, 2017: Sprint is offering domestic and international calling at no charge with no long distance fees or long distance call billing for all TRS and CTS users through Relay Hawaii service.

- Sprint Accessibility's platform provides the technology necessary to retrieve voice mail or answering machine messages including enabling and disabling touch-tone capability through hot keys (i.e. DTMF).
- Once all customer instructions have been followed and the caller disconnects, all information including caller's personal information is automatically deleted from the CA's position to ensure the caller's information is kept confidential.

Like TRS users, Relay Hawaii's CapTel users can retrieve answering machine messages from an answering machine near the CapTel phone. However, the CapTel user will need to follow instructions that are slightly different than TRS users including the following:

- Press the CapTel menu button that until the option, "Caption External Answering Machine Messages" is displayed. (Please note that the handset must be hung up to do this.)
- Press the "OK" button.
- Pick up the handset and place it near the answering machine.
- Watch the CapTel display to see when the CapTel CA is connected.
- Press the "play" button on the answering machine.
- View the captions on the CapTel display.
- Save, delete or navigate to the next message using the answering machine controls.
- When done, simply hang up the handset and the phone will be ready for the next call.

With other voicemail systems, the CapTel user can both hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

A.4 Handling of Emergency Calls

§64.604(a)(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Relay Hawaii accepts incoming emergency calls, and automatically and immediately transfers a call to an appropriate Public Safety Answering Point (PSAP). Through its contract with Sprint Accessibility, Relay Hawaii has access to the following:

- The largest footprint of coverage across the U.S. to terminate a 9-1-1 call
- A web interface with complete API and a branded end-user portal for address changes for internet calls.

Call Processing Procedures

Relay Hawaii uses the following procedures to ensure TRS users needing emergency services receive prompt assistance with their call.

1.	Relay Hawaii CAs act upon the word "emergency". Calls placed to fire, police, ambulance, and rescue		
	squads are considered emergency calls.		
2.	The CA hits a Phoenix function key (hot key) which designates the call as an Emergency. This key also		
	prompts the system to use the caller's NPA/NXX to automatically route the call to the E911 center which is		
	closest to the caller's rate center. This hot-key also "freezes" the screen with an emergency banner so that		

	the call information remains displayed. If the customer hangs up, the caller's information is available to be		
	shared with the 911 Center.		
3.	Simultaneously, the CA presses a key to notify the Supervisor. The Supervisor will assist the CA in		
	processing the call, if needed. The Supervisor does not take over the CA function unless requested or		
	necessary to complete the call.		
4.	The caller's Automatic Number Identification (telephone number) is passed to the E911 as Caller ID.		
5.	The CA identifies the call to the authorities, using the phrase: "This is an emergency. I am calling for a dea		
	(or hard of hearing or Speech Disabled) person through the Relay Hawaii Service. They are calling from		
	(caller's telephone number). This is CA # 1234, one moment please."		
6.	The CA advises the inbound caller that the emergency services is on the line. For example, "(POLICE ON		
	LINE NOW)" and then types the way the 911 operator answered the phone.		
7.	The CA relays the call. Unlike other Relay calls, CAs may step outside of their neutral role to more actively		
	facilitate communication, as needed.		
8.	Upon request, the CA connects the TTY caller directly to the PSAP (TTY).		
9.	The CA fills out an "Emergency Incident Form" which documents the call.		
10.	In the rare case of an E911 routing error, the CA will fill out a technical "trouble ticket" for additional		
	investigation.		

Back up Procedures

Through their contract with Sprint Accessibility, Relay Hawaii has access to an upgraded PSAP solution that has proven extremely accurate, resulting in few instances of PSAP routing errors. In many instances, two numbers are provided for each rate center. If one of the numbers fails, the second number is dialed. In the event that a valid number is not available, the CA will contact Directory Assistance for support.

CapTel Emergency Calling

When calling 911 using a one-line CapTel phone, the call is processed in the same way as a 911 call processed when using a standard telephone.

- The CapTel phone automatically converts to a Voice-Carry-Over (VCO) phone and dials 911 directly. (The CapTel Call Center is not engaged in processing 911 calls.)
- The CapTel phone will display the typed responses from the PSAP and the caller will use their voice to communicate with the PSAP.
- The user will be connected to the proper 911 Center in the least amount of time and the telephone number (ANI) will automatically be passed to the 911 Center.
- The 911 system renders the appropriate emergency response.

Two-Line CapTel Emergency Calling

Because Two-Line CapTel uses separate voice and data connections, it offers the most efficient way to access Emergency Services via 911 response Centers. The Two-Line CapTel user is connected directly to 911 on a standard voice connection. The captions are connected on the second line. This procedure means that the call is connected in the fastest time, to the most appropriate 911 Center every time, with a reliable voice grade connection and with full speed captions.

Training and Support Materials

Relay Hawaii CAs and Supervisors receive in-depth training on all emergency processes and procedures. This training is reinforced through on-going refresher training where Call Center staff must demonstrate knowledge and proficiency of Emergency processes and procedures. Supervisors or Operations Administrators are available 24x7 to assist CAs when an emergency call occurs. CAs also have immediate access to call processing steps via an online help screen and position reference guide.

Variations

There are many things that can happen during an emergency call, which require immediate action outside traditional call processing. The following processes were established for many of these "variations" to guide CAs and the Call Center staff on how to proceed:

Caller Disconnects Before Connecting to 911 Center

If the inbound caller disconnects prior to being connected to 911, the Phoenix system will continue dialing to the PSAP/emergency call center. The CA or Supervisor will notify the PSAP Call Center of the premature disconnect and will provide any customer information that may assist the PSAP center in resolving the emergency.

If a customer calls into the TRS center, types "HELP GA" and hangs up, we will treat this as an Emergency call. Since the customer does not give an emergency service name, Sprint Accessibility always connects the caller to the police. The CA will notify the Supervisor who, in turn, calls the police and passes on all known information about the call. The CA will also fill out an Emergency Incident Form as a record. The police will make the determination as to what kind of emergency it is and will dispatch the required emergency service.

Voice Emergency Calls

If a voice customer misdials 711 when actually they require assistance through 911, the CA will say to the inbound voice: "You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to a 911 center near your assigned telephone number, but there could be significant delay in getting assistance."

When the voice caller does not disconnect, requests further assistance, and/or remains online for more than 5 seconds after the notification phrase is read the CA will attempt to complete the call to connect the caller to emergency services. The CA will inform the caller, "I am connecting your call to Emergency Services, one moment please."

A.5 STS Called Numbers

§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Relay Hawaii offers the ability for STS users to maintain a record of regularly called names and telephone numbers. Relay Hawaii's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile.

When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," the STS CA will repeat the name and state the telephone number and then dial the associated ten-digit telephone number without delay.

§64.604 (6) Visual privacy screens/idle calls. A VRS CA may not enable a visual privacy screen or similar feature during a VRS call. A VRS CA must disconnect a VRS call if the caller or the called party to a VRS call enables a privacy screen or similar feature for more than five minutes or is otherwise unresponsive or unengaged for more than five minutes, unless the

call is a 9–1–1 emergency call or the caller or called party is legitimately placed on hold and is present and waiting for active communications to commence. Prior to disconnecting the call, the CA must announce to both parties the intent to terminate the call and may reverse the decision to disconnect if one of the parties indicates continued engagement with the call.

Relay Hawaii does not provide, contract to provide, or oversee VRS services and is exempt from this section.

§64.604 (7) International calls. VRS calls that originate from an international IP address will not be compensated, with the exception of calls made by a U.S. resident who has preregistered with his or her default provider prior to leaving the country, during specified periods of time while on travel and from specified regions of travel, for which there is an accurate means of verifying the identity and location of such callers. For purposes of this section, an international IP address is defined as one that indicates that the individual initiating the call is located outside the United States.

Relay Hawaii does not provide, contract to provide, or oversee VRS services and is exempt from this section.

Technical Standards

B.1 ASCII and Baudot

§64.604 (b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Relay Hawaii contracts with Sprint Accessibility to provide Baudot (45.5 and 50), Turbocode, Enhanced Turbocode (E-Turbo) and all ASCII rates generally in use. Upon a call being received at the CA position, TTY signals are automatically identified as Baudot, Turbocode or ASCII; if ASCII, the Baud rate is detected.

Outbound calls are dialed out in voice mode so that both the CA and hearing user (if applicable) can hear the progress of the call. If the phone is answered by a modem, the software will automatically switch to the appropriate mode of Baudot or ASCII based on the tone heard without intervention from the CA. If the call is answered by a voice person, the CA will request the text device if a voice user originated the call.

B.2 Speed of Answer

§64.604 (2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Relay Hawaii contracts with Sprint Accessibility, who currently has 13 TRS and CapTel centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS and CapTel calls. Sprint Accessibility samples the average answer time a minimum of every 15 minutes for each 24-hour period. Their Traffic Management Control Center (TMCC) is staffed with workforce analysts who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

Sprint Accessibility's Workforce Analysts develop staffing requirements for each center monthly, daily and in 15-minute increments. These center staffing lines are a management tool, which provides Workforce Analysts and each center with the following:

- Initial CA requirement for each 15-minute period of the day
- Total number of CAs scheduled for each-15 minute period
- The number of CAs over or under the requirement needed to meet forecast call volumes
- Daily, weekly, and monthly performance reports detailing speed-of-answer for each CA group and the CA utilization (occupancy) percentage. These reports are reviewed to ensure that Sprint Accessibility is routing calls as efficiently as possible while meeting or exceeding customer expectations.
- Adjustments to the minimum staffing requirements can be made as needed to the 15-minute scheduling requirements based on unforeseen increases or decreases in call volumes.

§64.604 (b) (2) ((ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

A requirement of the Relay Hawaii contract with Sprint Accessibility is that 85 percent of all calls be placed within 10 seconds. "Speed of answer" identifies the number of seconds required to answer a call. Relay Hawaii's CapTel speed of answer meets or exceeds the FCC's requirement to answer 85 percent of all calls within 10 seconds.

Relay Hawaii expects Sprint Accessibility will continue to review TRS and CapTel data to determine trends, taking into account any call affecting issues such as weather, holidays or technical problems. Utilizing this information, Sprint Accessibility develops a Network forecast for each upcoming scheduling week.

Sprint Accessibility also reviews each center's results for the previous six-weeks, as well as anticipated changes in staffing levels to determine each center's capacity to handle forecasted calls. Once the forecast has been determined, Sprint Accessibility ensures that total network traffic is accounted for by each of the centers.

By continually monitoring current capacity with regards to trunking, CA workstations, staffing and equipment lag time between anticipated need and actual need will be minimized.

§64.604 (b) (ii) (A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

Relay Hawaii considers the call delivered when the Relay Center's equipment accepts the call from the LEC, and the public switched network actually delivers the call to the TRS Center.

Sprint Accessibility furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint Accessibility's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

§64.604 (b) (ii) (B) Abandoned calls shall be included in the speed-of-answer calculation.

Through its contract with Sprint Accessibility, Relay Hawaii includes abandoned calls in its daily speed-of-answer performance calculations.

§64.604 (b) (ii) (C) A TRS provider's compliance with this rule shall be measured on a daily basis.

Sprint Accessibility measures its compliance with average speed-of-answer times on a daily basis and reports this information to Relay Hawaii on a monthly basis.

§64.604 (b) (ii) (D) The system shall be designed to a P.01 standard.

Relay Hawaii, through its TRS contract with Sprint Accessibility, ensures that all relay call centers are provided with sufficient facilities and staffing to provide a Grade of Service (GOS) of P.01 or better for calls entering the call center switch equipment during the busiest hour. Sprint Accessibility's Relay system ensures that an excess of 99.99 percent of all calls reach the call center and are answered or receive a ringing signal.

§64.604 (b) (ii) (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Performance of inbound traffic on each Hawaii relay toll-free number where it enters the Sprint Accessibility network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

§64.604 (b) (iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Relay Hawaii does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.3 Equal Access to Interexchange Carriers

§64.604 (b) (3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

The following information is applicable for the timeframe through May 31, 2017:

Relay Hawaii TRS and CapTel users have equal access to their chosen inter-exchange carrier through Relay to the same extent access is provided to voice users.

TRS and CapTel users are encouraged to register their preferred Carrier-of-Choice (COC) with Customer Service. Users who have not registered their preferred COC are encouraged to contact the toll-free telephone support (Customer Service) to complete their registration. All new CapTel phones come with a COC card packaged with the equipment. Users are responsible for filling out the card or contacting CapTel Customer Service to receive the benefits of registering their COC preferences for CapTel calls.

Voice-in users calling CapTel users are also notified that their call may incur long distance charges. After connecting to the CapTel voice-in Voice Response Unit (VRU) and entering the phone number of the CapTel user they wish to call, they may receive a verbal announcement stating that their call may include long distance charges.

Relay Hawaii relies on Sprint Accessibility to provide its Relay customers with both the technical and operational capability to send and receive COC calls to and from other providers. Sprint Accessibility's network has the capability to permit users to select the IXC or LEC of their choice in accordance with State and Federal law.

Sprint Accessibility provides the necessary network connections and signaling information in compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled "ATIS-0300084, Telecommunications Relay Service" (July 2006) for carriers to accurately bill and rate Relay calls. Sprint Accessibility routes calls to the designated carrier in as efficient a manner as possible. Sprint Accessibility includes the identification of the call as a Relay call, the end user calling number, the called number, and additional information describing the nature of the calling line (e.g., payphone). Calls not requiring operator assistance are routed to the carrier's non-operator switch. Calls involving alternate billing (e.g., card, collect, third party) involve the operator services position of the carrier. Again, Sprint Accessibility provides as much information as possible to the operator services position of the transport carrier through network signaling. Efficient provision of routing to the carrier minimizes the call set-up time associated with the Relay call.

Sprint Accessibility encouraged all Carriers to participate in its Carrier of Choice ("COC") program. When the requested Carrier was not a COC participant, Sprint Accessibility had established a procedure where the Carrier was notified, verbally and in writing, of its obligation to provide access to relay users and encouraged their participation.

Outlined below was the process used by CAs to process COC calls and subsequent instructions to relay callers:

- Sprint Accessibility CA answers the call
- The caller provides the toll-call information.
- The caller provides preferred Carrier information either registered in the user database or for a specific call.
- If the preferred Carrier is not available through the Relay, the CA informs the caller with the standard phrase: "I AM SORRY (carrier) DOES NOT ALLOW (billing method) CALLS OVER THEIR NETWORK."
- The user may choose to have another Carrier handle the call. Sprint Accessibility then informs the unavailable Carrier of its obligation to provide access through the Relay Service.
- The CA outdials the call utilizing the preferred Carrier. If no Carrier is specified, the call will be carried over the Sprint Accessibility network.
- The called-party answers the call. The CA relays the COC call between the caller and the called-party.

Sprint Accessibility had 260 carriers participating in the Sprint Accessibility's TRS COC program. Participation of Carriers in Hawaii is dependent on whether carrier is authorized to provide service in Hawaii and connectivity to the Sprint Accessibility Access Tandem.

The following information is applicable beginning June 1, 2017:

As part of our overall corporate technology evolution to provide all of our customers with communications delivered in a cost-effective, high performance manner, Sprint has already decommissioned aging infrastructure whose upkeep costs our customers more. For all of our Relay users, this also means simpler and guicker call set-up.

In August of 2016, Sprint received a waiver of end user selection of carrier from the FCC. As a result, Sprint is offering *domestic and international calling at no charge* with no long distance fees or long distance call billing for all TRS and CTS users through Relay Hawaii service. Sprint's optimal approach provides less cost to the end user, fewer billable minutes to the State, greater functional equivalence, and fewer customer complaints.

Sprint's approach as a global telecommunication provider includes the following benefits for Relay Hawaii and its end users:

- Correctional Facilities: Sprint will process calls from inmates at correctional facilities without charge. Please note, inmate calling services (ICS) providers may assess fees directly to relay users as is done for traditional phone users (i.e., non-relay callers).
- Payphones: Sprint will *provide domestic and international calling at no charge* for Relay Hawaii callers using payphones.
- International Locations: Sprint will provide <u>outbound international calling at no charge</u> for TRS and CTS users. Inbound access is available with customers being charged.
- **Directory Assistance**: Sprint is offering <u>access to Directory Assistance at no charge</u> through for Relay Hawaii Service.
- Pay Per Call Services: Sprint will continue to process calls to 900 access numbers. The 900 services provider may assess fees directly to relay users.

B.4 TRS Facilities

§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

Relay Hawaii and Sprint Accessibility Customer Service are both available 24x7 for all TRS services. Relay Hawaii, through Sprint Accessibility, utilizes both Uninterruptible Power Supply (UPS) and backup power generators to ensure relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. CapTel Relay Services are also available 24x7.

§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

Relay Hawaii contracts with Sprint Accessibility's Relay centers, which are equipped with an UPS, generator, and sufficient fuel to provide power for 24-hours following a power failure. These back-up power systems can continue to provide power beyond 24-hours as long as fuel is readily available.

Working in parallel with the UPS is Sprint Accessibility's Intelligent Call Router, which instantly recognizes a problem anywhere in the Sprint Accessibility system and routes the calls to other operating call centers. Relay Hawaii customers will be unaware of any system fault.

In the event of a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms and Call Detail Record (CDR) recording. As a safety precaution, the fire suppression system is not electrically powered in case of a fire during a power failure. Once the back-up generator is on line, stable power to all relay

system equipment and facility environmental control is established and maintained until commercial power is restored..

All of the system preventive maintenance functions can be performed on-line, with no effect on call processing. In addition, on-line and off-line diagnostic routines will identify system faults or failures to the individual board level. Diagnostic procedures are continually processed by the switching system software to detect defective components before they are used. Manual on-line diagnostics can be launched at any time from the maintenance and administrative terminal located with the unit without affecting call processing, calls in progress or calls waiting to be answered. The maintenance and administrative terminal includes keyboard, screen and printer capabilities.

§64.604 (b)(4)(iii) A VRS CA may not relay calls from a location primarily used as his or her home.

Relay Hawaii does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

§64.604 (b)(4)(iv) A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of use. In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform.

Relay Hawaii does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.5 Technology

§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Relay Hawaii through Sprint Accessibility, is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, Relay Hawaii will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Relay Hawaii receives calling party identifying information including blocking information, from all relay users. Sprint Accessibility's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint Accessibility passes through the calling party information (rather than 711 or the number of the Relay Center)

State-of-the-Art Technology

As the provider of relay services for the State of Hawaii, Sprint Accessibility offers several enhanced features to improve the telecommunications access of STS relay users. These advanced features include:

- Message Retention (up to 24 hours)
- STS Called Numbers
- Privacy Option
- STS Contact Information
- STS Email Call Set-up
- STS with Voice Carry Over
- Specialized STS Customer Service (including Training Line)
- Wireless Access STS (*787)

Wireless Access - STS (*787)

In early 2012, Sprint Accessibility announced the first wireless short-code solution for STS users. Sprint Accessibility wireless customers are able to dial *STS (*787) to reach a STS CA quickly and easily from anywhere in the nation. All callers who are physically located within the state are automatically connected to an STS CA. This service is available to both callers with and without a speech disability who need to place an STS call. Voice callers needing to place a call to an STS user may also use this service.

When Hawaii TRS customers travel outside of the state, callers will automatically connected to STS based on their physical location. If they are in a state where Sprint Accessibility is the Relay provider, the caller is connected to the State's STS. If not, callers are automatically transferred to Sprint Accessibility's interstate STS, where they will be able to place interstate calls only. This exciting new enhancement grants additional mobility and flexibility for STS users.

STS Message Retention

Sprint Accessibility expanded its Customer Profile to allow STS users to retain messages for up to 24 hours. The STS user may dictate the first message to be read to the called party. This feature allows the STS user to request that this initial message be retained in the Relay system for up to 24 hours. This is especially helpful if the STS user needs to leave a message and the line is busy. If the called party is unavailable (e.g. busy signal, no answer), the STS user may request that the STS message be retained. Over the next 24 hours, the STS user can redial their state STS and request that the call be attempted without delay. At the end of 24 hours, the message is automatically deleted from the Customer's Profile.

STS Called Numbers

Sprint Accessibility continues to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Sprint Accessibility's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, can be transferred to any new STS provider.

When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the STS CA will dial the associated ten-digit telephone number without delay.

Please see the following graphic for the written Customer Profile form, which encourages STS users to register speed dial entries.

Name	Area Code & Phone Number

STS with Privacy Option

Sprint Accessibility offers STS users the ability to communicate without the CA hearing the voice party. If this option is selected, the CA simply listens to the voice of the STS user and repeats messages according to the STS users' preference.

STS Contact Information

Communicating telephone numbers may be difficult for some STS users. This feature allows STS users to simply advise friends, family and others to dial 711 to reach them. Once connected, the person can simply provide the STS user's name to the STS CA. The STS CA will use the STS user's profile information provided for this purpose to connect to the STS user based on the registered STS user's hours and days of availability. In this manner, the inbound caller can be connected with the STS user at their location.

Emergency Numbers

In most emergency situations, STS callers dial 911 first for emergency help. However, this may be especially challenging for STS users. STS users also have the ability to list up to ten additional emergency phone numbers in their Customer Profile. Contacts such as a doctor's office, the local/state poison control center and the local hospital are used for this purpose.

B.6 Caller ID

§64.604 (b) (6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Relay Hawaii, through their contract with Sprint Accessibility, provides true Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long distance calls. Sprint Accessibility will receive calling party identifying information including blocking information, from all TRS users.

Customer Control

With Sprint Accessibility's TRS Caller ID, the Relay user is in control. Relay users with this feature are able to disable or block their Caller ID information from being transmitted with their LEC on either a 'per-call' or a 'per-line' basis.

The TRS user can view the calling party's information before picking up the phone. The Relay user can then decide whether or not to answer the call based on the name and number displayed on the Caller ID unit or their telephone display screen.

With Sprint Accessibility's Caller ID, there are numerous benefits for TRS users, including:

- Increased privacy
- Documentation of calls received
- A count of incoming calls on the display screen
- Phone numbers of hang-up callers
- Prompt emergency call processing

When Caller ID information is not passed through, as with standard telecommunications, the call recipient will receive a message such as "Out of Area" or "Caller Unknown."

Technology

Sprint Accessibility offers True Caller ID for all local and long-distance calls to Carriers who have SS7 connectivity with Sprint Accessibility. Sprint Accessibility's network interfaces with all global Carriers and major LECs, CLECs, and ILECs. Sprint Accessibility's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller and other SS7 call information elements such as: the Calling Party Number, Charge Number, and Originating Line Information. Sprint Accessibility passes through the calling party information (rather than 711 or the number of the TRS Center).

Caller ID Enhancements

Many Caller ID enhancements are compatible with the Relay service and can be accessed by TRS users.

Selective Call Acceptance

Selective Call Acceptance allows a user to create a list of phone numbers so the user will receive only calls from numbers on that list. All other callers will be directed to an announcement that says "The number you have dialed is not accepting calls at this time." If this recording is reached by Relay, it will be typed or spoken to the inbound caller. When Selective Call Acceptance is in effect, it supersedes all other enhanced features.

Selective Call Rejection

Selective Call Rejection enables the user to create a list of special phone numbers so that when a call is received from that number, the call will be rejected. If this recording is reached by Relay, it will be typed or spoken to the inbound caller.

Selective Call Forward

Selective Call Forward enables the user to create a list of special phone numbers so that when a call is received from someone on that list, the call will be forwarded to a designated number.

Privacy ID (Anonymous Call Rejection)

Privacy ID, also known as Anonymous Call Rejection, allows users to restrict incoming calls from parties who have blocked their Caller ID information. If the name or number of the person that calls you is unknown, the caller hears a recorded message, such as: "The person you are calling does not accept blocked or unknown calls. At the tone, please say your name or company name and your call will be connected."

This information will be typed or voiced to the originating caller. If the calling party wishes to leave their name, it will be left by the CA. The called party, if hearing, may listen to the recording and choose an option to answer, block or send to voicemail.

Instant Access List (Preferred Caller List)

Users may designate a list of up to 10 numbers that can bypass the Sprint Accessibility Privacy ID function. If a caller's number displays while their name does not, adding their number to this list will let their calls through.

Caller's Access Code

Caller's Access Code allows a user to designate an override code for Privacy ID. The user may share this code with friends and family, as desired. When the calling party calls, they may choose to enter a code during the intercept greeting to bypass the Privacy ID screening so their call will go through. This works great for friends and family who frequently call from areas where Caller ID is not available.

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2008, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2008 shall indicate the number of complaints received from the date of OMB approval through May 31, 2012.

Relay Hawaii has established policies regarding complaints, inquiries, comments and commendations related to Relay Services and personnel. Upon receipt of a direct complaint filed by a customer, a designated representative will accept the complaint, provide the customer with information regarding the process for resolution and will offer to follow-up with the customer. Sprint Accessibility ensures that all records will include the name and/or address of the complainant (when offered), the date received, the CA identification number, the nature of the complaint, and the result of any investigation and the date of resolution.

Relay Hawaii works closely with their TRS provider (Sprint Accessibility) to identify contact particulars such as: consumer type (TTY, VCO, HCO, Voice, or STS), customer contact information (when given), CA identification numbers, the call handling center and over 45 contact categories including: complaints, inquires and unsolicited commendations.

Sprint Accessibility submits reports detailing the information above. Each report will include the following information:

- Name of the complainant or commendation
- The date of the contact, complaint or compliment
- The nature of the complaint or comment
- The action taken i.e. technical support, service explanation, CA development area, preparation of commendation

All contacts and complaints received by Customer Service, Supervisors, and Account Management will be documented in Sprint Accessibility's customer contact database.

Customer Contacts Online Database (CCOD)

To further support the complaint resolution process, Sprint Accessibility has developed a Customer Contact Online Database (CCOD), which serves as a seamless and timesaving device for documenting customer contacts.

The CCOD will automatically notify the TRS Sprint Accessibility program manager assigned to the State of Hawaii via email of any complaint entry, ensuring that they receive timely notification of consumer concerns. The CCOD will track consumer contact information as required by the FCC.

By approximately June 15th of each calendar year, Sprint Accessibility submits a copy of 12-month complaint log report for the period of June 1- May 31 to the State relay administrators. Relay Hawaii reviews the log and then passed the complaint log to the FCC by July 1st of each year.

C.2 Contact Persons

§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

Relay Hawaii callers may file intrastate complaints and commendations regarding Relay Hawaii services through the following contacts:

Lisa Tom, Customer Relations Manager

Relay Hawaii

Address 420 Waiakamilo Road, Suite 405

Honolulu, HI 96817

Web: <u>www.relayhawaii.com</u> Email: lisa.l.tom@sprint.com

TTY 844-882-3160

Contract Administrator Name Delmond J. Won, Executive Officer

Public Utilities Commission, State of Hawaii 465 South King, Kekuanao`a Bldg., Room 103

Honolulu, HI 96813

Email: delmond.j.won@hawaii.gov
Web Address: http://puc.hawaii.gov

Fax: 808-586-2066 Voice: 808-586-2020

C.3 Public Access to Information

§64.604 (3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to

educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Hawaii PUC is committed to providing a comprehensive outreach program on all TRS services. Relay Hawaii's outreach and marketing include: (1) partnering with State agencies to conduct outreach activities throughout the state; (2) working with agencies to identify an individual to act as the point of contact for information regarding Hawaii's relay service; (3) Relay Hawaii – Public Service Announcement, newsletters, media relations; (4) map information; (5) CD ROM -"Don't Hang up on Relay" publicity campaign and other publicity programs; (6) conferences, events, tradeshows, sponsorship funds, and program advertisement; (7) Relay Hawaii flyers for relay call types including STS; (8) TTY distribution program – promotion and awareness; (9) promotional items – State relay branded give-a-ways (magnets, pens, key chains); and (10) miscellaneous outreach expenses (videotapes, Powerpoint slides, postage, supplies).

Relay Hawaii Website

Relay Hawaii provides an easy-to-navigate website to advertise to and educate the general public, existing Relay Hawaii users and potential new users. Relay Hawaii continually updates the Relay Hawaii website: www.relayhawaii.com. Information found on the Relay Hawaii website includes:

- Instruction on various call-types
- Updates on new services and technologies
- Access to the Customer Preference Database
- Information and instructions how to file a complaint/concerns or ideas
- Frequently Asked Questions

A picture of Relay Hawaii website has been provided in Appendix H.

Hawaii CapTel Website

Relay Hawaii understands some CapTel users may not identify themselves as traditional relay users. In order to tailor information directly related to CapTel users, Relay Hawaii provides a separate website dedicated to Relay Hawaii Equipment Program (RHEP) and CapTel-related information. Relay Hawaii provides a direct e-mail link to contact the Sprint Hawaii Account Manager and CapTel Outreach Specialists for comments, concerns, or commendations related to Captioned Telephone services. The Hawaii CapTel website is www.hawaiicaptel.com.

Additional information includes:

- Assistance selecting the best CapTel solution for the caller
- Instruction on various call-types
- Updates on new services and technology
- Video clips and Video-logs (VLOG) of how to use a CapTel phone
- Application forms and information on how to order a CapTel phone

A picture of Hawaii CapTel website has been provided in Appendix H.

Hawaii Relay Conference Captioning (RCC)

Sprint's RCC service is currently offered to the Federal Government and its employees, State governments and businesses across the U.S. Traditionally, there has been limited access to Captionists and Interpreters in Hawaii, particularly on some of the Islands. In 2008, this service filled a specific need in the State of Hawaii whereby the service can be provided at a remote location separate from the Deaf or Hard-of-Hearing person.

RCC is offered by VITAC Corporation (formerly Caption Colorado Inc.). Founded in 1991, Caption Colorado is a Limited Liability Company registered in the State of Colorado. Using the same Stenocaptioners that produce closed captioning for live television, news, sports and weather, RCC users receive live, real-time text streamed to any Internet-connected computer. Conference calls are becoming more and more prevalent in the work environment. More workers rely on teleconferencing as a normal course of business. RCC provides the tools for Deaf and Hard-of-Hearing individuals to fully participate in multi-party conference calls with Sprint's RCC service.

A picture of Hawaii RCC website: www.hawaiircc.com has been provided in Appendix H.

- Po Not Hang Up on Relay Relay Hawaii implemented the "Do Not Hang Up on Relay Campaign. Relay Hawaii offers a CD-ROM/ videotape to the general public for the purpose of educating people about Hawaii Relay. The CD-ROM videotape includes messages from consumers, as well as information about Hawaii Relay. This program is designed to improve awareness within the business community and the general public about TRS. It is our goal to reduce the number of "hangups" on Relay and to increase awareness in the business community of Hawaii Relay. See 711 flyer in the Appendix H.
- CapTel Campaign
 Specific marketing materials for CapTel services and devices are designed to increase public awareness. A CapTel Public Service Announcement (PSA) airs on local television stations and other media advertisements. This PSA was originally launched in New York and has also become available to other states. Please see Appendix H for Digital Ad.
- Speech-to-Speech Publicity Hawaii PUC recognizes the importance of publicity campaigns to educate the community on the unique telecommunication needs of the Speech-Disabled community with Relay Hawaii's presents at statewide conferences and conventions with information and literature. Relay Hawaii is available to consult and train on STS awareness, thereby raising awareness and understanding of STS services. The STS Service allows Speech-Disabled customers to use their voice, with assistance from a CA, if necessary, to communicate through the Relay Hawaii Service to non-Speech-Disabled individuals.

Relay Hawaii continues to provide outreach to seniors, deaf, hard of hearing and speech disables populations through other venues. A brochure and flyer are also available to educate the public about Relay Hawaii (see Appendix H).

Relay Hawaii and the PUC have a long history of developing and delivering an effective Community Outreach program supporting Relay Hawaii. Sprint is proud of the Outreach Program we have cultivated over the years. Many of these programs are not available through other providers or in other states including the following accomplishments.

C.4 Rates

§64.604 (4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination

The following information is applicable for the timeframe through May 31, 2017:

Relay Hawaii users are not charged more for services than for those charges paid by standard "voice" telephone users. TRS users, who select Sprint Accessibility as their interstate carrier, will be rated and invoiced by Sprint Accessibility. The caller will only be billed for conversation time

By FCC jurisdiction, Sprint Accessibility has two separate Message Telephone Service rates – one for interstate and one for intrastate. The following table exhibits the discounted rates off Sprint Accessibility's Message Telephone System (MTS) rates.

	Intrastate	Interstate
Day (7 AM – 6:59 PM)	35%	50%
Evening (7 PM – 10:59 PM)	25%	50%
Night/weekend (11 PM – 6:59 AM all day Saturday & Sunday)	10%	50%

March 17, 2016 through May 31, 2017

In states where Sprint is the contracted TRS provider, INTRAstate Sprint long distance rates for TRS users will be assessed at a rate of \$0.03 per minute.

Effective June 2017, we provide long distance at no charge. This is as result of CG Docket No. 03-123 granted by the FCC on August 24, 2016.

C.5 Jurisdictional Separation of Costs

§64.604 (5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

All Relay Hawaii intrastate and interstate minutes are reported separately to the state on the Sprint Accessibility invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State. On individual customer invoices, Sprint Accessibility deducts minutes for which the Rolka Loube Saltzer Associates (RLSA), the Interstate TRS Fund administrator, reimburses. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free, and 900. In accordance with FCC rules, states only receive a 51 percent deduction for Toll Free and 900 minutes for which RLSA reimburses. For RSLA reimbursement, Sprint Accessibility uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RSLA for reimbursement.

ADA Requires TRS Services

In July 1990, the Americans with Disabilities Act (ADA) was passed by our Congress. Title IV of the ADA requires that all states provide relay services to deaf and hard of hearing people 24x7.

Hawaii's current provider, Sprint Relay, implemented intrastate TRS on July 1, 2003, as authorized under the Hawaii Revised Statutes (HRS) §269-16.6. HRS §269-16.6 requires the Hawaii PUC to investigate the availability of experienced providers of quality TRS, and a contract for the provision of relay services rendered on or after July 1, 1992 be awarded to the best qualified provider of these services.

Telecommunications Relay Fund

§64.604 (c)(5)(iii) through §64.604 (c)(iii)((M) does not pertain to State programs. However, the state of Hawaii contracts with Sprint Accessibility who contribute and collect interstate funds through RLSA. It is the State's understanding that Sprint Accessibility complies with the appropriate mandates under this section.

§64.604 (c) (7) (N) (1-4) pertain to VRS providers. The State of Hawaii does not provide VRS services, does not contract to provide VRS services and is exempt from this section.

C.6 Complaints

§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

Relay Hawaii works in conjunction with the TRS provider, Sprint Accessibility, to establish a complaint resolution procedure to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communications Assistants.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an onsite technician. The state-assigned Account Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. Relay Hawaii customers also have the option of calling Sprint Accessibility's 24-hour Customer Service department, the Sprint Accessibility Account Manager, or the Hawaii PUC to file complaints or commendations.

Relay Hawaii has adopted the informal FCC procedure of closing all complaints, complete with a satisfactory resolution, within 180 days of the date the complaint was filed. Relay Hawaii submits all complaints from June 1-May 31st to the FCC by the annual July 1st deadline.

C.7 Treatment of TRS Customer Info

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

Relay Hawaii, through Sprint Accessibility's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, carrier of choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes in customers' profiles. At the end of the ensuing contract(s) Sprint Accessibility will transfer all TRS database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

Sprint Accessibility does not use customer information for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Sprint Accessibility will not sell, distribute, share or reveal in any other way by the relay center or its employees, unless compelled to do so by lawful order.

§64.606 State Certification

3(b)(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation: (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604; (ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and (iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

Hawaii has provided relay services since 1989. Legislative mandates, which established rules for the relay programs are enclosed as Appendix I. Further evidence of Hawaii's commitment to follow the FCC minimum mandatory relay requirements can also be found in the mandatory items listed in the most recent RFS, released in 2017.

Sprint Accessibility does not provide Video Relay Services or Internet Relay services for the state of Hawaii. Although there are references to Sprint Relay IP and Sprint Relay VRS services, Hawaii PUC does not contract to provide these services, nor does Hawaii PUC oversee these services for the state of Hawaii.

Hawaii meets or exceeds all minimum mandated relay services required under all FCC rules, including 47 C.F.R \$64.604. Hawaii does not provide relay services or features that conflict or circumvent the FCC rules. Presently, Hawaii provided several features through Sprint Relay that exceed the minimum mandatory rules, including

- Customized Access Numbers Hawaii provides dedicated 800 numbers (VCO, STS, Spanish Relay, ASCII, Voice, and other access numbers as requested) to assist relay users who want to access relay services specifically by their call type.
- Two Line VCO and Reversed Two Line VCO Hawaii provides two line VCO and reversed two line VCO as an enhanced VCO service, allowing consumers to utilize their voice and residual hearing as much as possible.
- E-Turbocode Hawaii contracts with Sprint Relay to provide E-Turbocode. Sprint Relay is the only relay provider that has E-Turbocode as part of its TRS standard features package for State relay contracts. E-Turbocode, which provides faster transmission of the relay conversation for relay users, exceeds this requirement.
- Captioned Telephone services (CapTel) Hawaii provides CapTel an enhanced VCO service and therefore exceeds this requirement.
- Non-shared languages Hawaii provides Spanish to English and English to Spanish to relay users in need of this service, and therefore exceeds this requirement.

As stated under C.5, Jurisdictional Separation of Costs, to cover the cost of providing the TRS programs, intrastate telecommunications carriers, including wireless carriers, contribute into the Hawaii TRS Fund. The Hawaii TRS Fund pays for intrastate calls as well as other expenditures not covered under interstate reimbursement requirements established by the National Exchange Carrier Association (NECA).

Relay Hawaii was approved for TRS Certification Renewal by the FCC in 2013. For a copy of this letter, please see Appendix K.

§64.606(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

There have been no substantive changes with Hawaii TRS since the FCC renewed their TRS recertification in 2013.



News Media Information 202 / 418-0500 Internet: https://www.fcc.gov

TTY: 1-888-835-5322

Federal Communications Commission 445 12th St., S.W. Washington, D.C. 20554

DA 17-697 Released: July 19, 2017

CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU REMINDS STATE TELECOMMUNICATIONS RELAY SERVICE PROGRAMS TO SEEK RECERTIFICATION CG Docket No. 03-123

Under Section 225, states wishing to operate their own telecommunications relay service (TRS) programs for the provision of intrastate and interstate TRS must have certification from the Federal Communications Commission (FCC or Commission) to do so.¹ Commission rules provide that states and covered territories may receive TRS certification in five year increments.² This Public Notice alerts states and territories that the certifications they now hold will expire on July 25, 2018. Under the Commission's rules, each certified state or territory may file an application for renewal of its certification one year prior to expiration, i.e., beginning July 25, 2017.³ Although there is no prescribed deadline for filing, we request that renewal applications be filed no later than October 1, 2017, to give the Commission sufficient time to review and rule on the applications prior to expiration of the existing certifications.

Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA),⁴ codified at Section 225 of the Communications Act of 1934, as amended (Act).⁵ TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with other individuals.⁶ Under the Act, the Commission must ensure that the provision of TRS is functionally equivalent to voice telephone services.⁷ The Commission's TRS regulations set forth mandatory minimum standards that TRS providers must follow to meet this functional equivalency mandate.⁸

All certified state TRS programs are required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and speech-to-speech relay (STS) service. States may also offer captioned telephone relay service (CTS). Each state seeking renewal of its certification must submit documentation to the Commission that describes its relay program and includes its procedures and remedies for enforcing any requirements that the program may impose. In addition, a state must establish that its program makes

¹ 47 U.S.C. § 225(f). TRS are "telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio with one or more individuals, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services by wire or radio." 47 U.S.C. § 225(a)(3). *See also Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, 12479, para. 3 & n.18 (2004) (describing how a traditional TRS call works). Although state TRS programs may offer interstate as well as intrastate TRS, only the costs associated with the provision of intrastate TRS are recovered from the state. *See* 47 U.S.C. § 225(d)(3).

² 47 CFR § 64.606(c)(1). The Consumer and Governmental Affairs Bureau (CGB or Bureau), under delegated authority, issued its last round of certification grants in July 2013. *Notice of Certification of State Telecommunications Relay Services (TRS) Programs*, Public Notice, 28 FCC Rcd 9987, 9987 (CGB 2013). ³ 47 CFR § 64.606(c)(1).

⁴ Pub. L. No. 101-336, 104 Stat. 327 (July 26, 1990).

⁵ 47 U.S.C. § 225.

⁶ *Id.* § 225(a)(3).

⁷ *Id.* § 225(a)(3).

⁸ See 47 CFR § 64.604.

⁹ See 47 CFR § 64.603.

¹⁰ Since 2003, CTS has been a non-mandatory type of TRS that is eligible for compensation from the states for intrastate calls and from the Interstate TRS Fund for interstate or IP-based CTS calls. *Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Declaratory Ruling, 18 FCC Rcd 16121 (2003).

¹¹ 47 U.S.C. § 225(f); 47 CFR § 64.606(a).

available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints. ¹² This certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. The Commission's TRS rules further explain that documentation should be submitted in narrative form, and that the Commission shall provide the public with notice of and an opportunity to comment on such applications. ¹³

Per the following schedule, the Bureau will release for public comment each application for renewal, after which it will review each application to determine whether the state TRS program has sufficiently documented that it meets or exceeds all of the applicable operational, technical and functional mandatory minimum standards set forth in section 64.604 of the Commission's rules. ¹⁴ The state must also establish that the program does not conflict with federal law. ¹⁵ In addition, applications will be reviewed to ensure that each state TRS program makes available adequate procedures and remedies for enforcing the requirements of each state's program. ¹⁶ The Bureau will release public notices of renewal of certification for each state on a rolling basis.

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE

DATE	FCC ACTION	PROCESS
Beginning	CGB will issue Public Notices	Comments are due within 30 days of release of the Public Notices;
July 2017	seeking comment on state TRS	reply comments are due within 15 days thereafter.
	applications that have been filed.	
July 2017 -	CGB will review applications for	If necessary, the Bureau will send deficiency letters requesting
May 2018	TRS recertification for	additional information from states to ensure compliance with TRS
	compliance with 47 CFR §§	mandatory minimum standards and other certification
	64.604 and 64.606.	requirements.
May 2018 -	CGB will issue certification	
July 2018	renewals on a rolling basis.	

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123 and be captioned "TRS State Certification Application."

Electronic Filers: Filings may be filed electronically using the Internet by accessing the Commission's electronic comment filing system (ECFS): http://apps.fcc.gov/ecfs/. Follow the instructions provided on the website for submitting electronic filings. For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal service mailing address, and CG Docket No. 03-123.

Paper Filers: Parties who choose to submit by paper must submit an original and one copy of each filing. To expedite the processing of the applications, parties submitting by paper are encouraged to submit an additional copy to Attn: Dana Wilson, Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, SW, Room 3-C418, Washington, DC 20554 or by email at Dana.Wilson@fcc.gov.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filing for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th Street, SW, Room TW-A325, Washington, DC 20554. The filings hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of *before* entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class mail, Express Mail, and Priority Mail must be addressed to 445 12th Street, SW, Washington, DC 20554.

¹⁴ 47 U.S.C. § 225(f)(2)(A). See 47 CFR § 64.604.

¹² 47 CFR § 64.606(b)(1)(ii).

¹³ *Id.* § 64.606(a).

¹⁵ 47 CFR § 64.606(b)(1)(iii).

¹⁶ 47 U.S.C. § 225(f)(2)(B).

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC 20554. Filings also may be found by searching on the Commission's Electronic Comment Filing System (ECFS) at http://apps.fcc.gov/ecfs/ (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice), 844-432-2275 (videophone), or 202-418-0432 (TTY).

For further information, please contact please contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disability Rights Office, at (202) 418-2247 (voice) or e-mail at Dana.Wilson@fcc.gov.

-FCC-

<u>Appendix B – FCC Matrix, TRS, STS, CapTel Training Outlines</u>
Please see the following table for a point-by-point explanation of how we meet and/or exceed each of the minimum federal standards.

FCC Minimum			
Standard	Applies to:	Compliant	Sprint's Approach
CA Training 47 C.F.R. § 64.604(a)(1)(i)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint offers a comprehensive training program designed to offer the best quality to all relay users. Sprint's 2-3 week program includes training on Diversified Culture, compliance with regulatory requirements, & the operation of Sprint's systems.
CA Skills 47 C.F.R. § 64.604(a)(1)(ii)	TRS, STS, CTS, IP CTS, IP Relay (Partially waived for CTS, IP CTS)	Exceeds	Sprint ensures all CAs are skilled in typing, grammar, spelling, & interpretation of typewritten ASL (as applicable), familiar with hearing & speech disability culture, language, & etiquette; & have clear & articulate voice communication skills.
CA Typing 47 C.F.R. § 64.604(a)(1)(iii)	TRS, STS, CTS, IP CTS, IP Relay (Waived/partially waived for CTS, IP CTS)	Exceeds	Sprint's CAs type &/or transcribe conversations at a rate greater than 60 words per minute. CA testing is conducted at least quarterly.
VRS CA Qualifications 47 C.F.R. § 64.604(a)(1)(iv)	VRS	N/A	This requirement is not applicable to the services being offered.
Call Takeover 47 C.F.R. § 64.604(a)(1)(v)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	As a general rule, Sprint allows CA takeovers only when necessary. Sprint's CAs stay with any given call for a minimum of 10 or 20 minutes, as defined by the FCC.
Gender Preference 47 C.F.R. § 64.604(a)(1)(vi)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint makes its best efforts to accommodate its customers' requests regarding the gender of the CA handling their calls — both at call initiation &/or call takeover.
Real Time 47 C.F.R. § 64.604(a)(1)(vii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint's sophisticated software enables real- time communication for all Relay users.
STS Voice Mute Option 47 C.F.R. § 64.604(a)(1)(viii)	STS (Waived for TRS, IP Relay, CTS, IP CTS)	Meets	Sprint offers STS users the option to mute their voice so the other party to the call will hear only the CA & will not hear the STS user's voice.
Confidentiality Rule 47 C.F.R. § 64.604(a)(2)(i)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint has systematic & operational processes intended to prevent disclosure of call content &/or Customer Proprietary Network Info (CPNI), except as authorized by 47 U.S.C. § 605. STS CAs may retain info from a particular call in order to facilitate the completion of consecutive calls, at the request of the user.
Conversation Content 47 C.F.R. § 64.604(a)(2)(ii)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint bars its CAs from intentionally altering the conversations they relay, except to the extent necessary to: (i) translate ASL calls to conversational English; (ii) facilitate STS calls without interfering with the independence of the user; or (iii) necessary to provide info to emergency responders.
Sequential Calls 47 C.F.R. § 64.604(a)(3)(i)	TRS, STS, IP Relay (Waived for CTS, IP CTS)	Meets	Sprint CAs do not refuse single or sequential calls.
Call Length 47 C.F.R. §	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint never limits the length of a Relay call.

FCC Minimum	Applies to:	Compliant	Sprint's Approach
Standard	Applies to:	Compilant	Sprint's Approach
64.604(a)(3)(i)	TD0 0T0 0T0		
Types of Calls	TRS, STS, CTS,	Meets	Except to the extent the requirements are
47 C.F.R. § 64.604(a)(3)(ii)	IP CTS, IP Relay		waived, not permitted, or as the FCC determines that it is not technologically
04.004(a)(3)(11)			feasible to do so, Sprint services are capable
			of handling any type of call normally provided
			by telecommunications carriers.
Credit Authorization	TRS, STS, CTS	Meets	Sprint understands it is permitted to decline a
47 C.F.R. §	(Waived for IP		call if the user cannot pay or because a
64.604(a)(3)(iii)	CTS, IP Relay)		credit authorization for toll calls is denied.
Pay Per Calls	TRS, STS, CTS	Exceeds	Sprint processes pay per calling for TRS &
47 C.F.R. § 64.604(a)(3)(iv)	(Waived for IP CTS, IP Relay)		CapTel users with blocks available via the Customer Profile.
Call Combinations	TRS (Partially	Meets	Sprint's Relay services support all mandatory
47 C.F.R. §	waived for CTS,	Moore	FCC call types.
64.604(a)(3)(v)	IP CTS, IP		3,111
	Relay)		
Call Release	TRS (Waived for	Meets	Sprint provides TTY-TTY call set-up which
47 C.F.R. §	CTS, IP CTS, IP		allows the CA to set-up the call & drop off the
64.604(a)(3)(vi)(1)	Relay)	Meets	line, if not needed to facilitate conversation.
Speed Dial 47 C.F.R. §	TRS, STS, CTS, IP Relay (Waived	Meets	Sprint's TRS/CTS speed dial is available with a Customer Profile. CapTel users can select
64.604(a)(3)(vi)(2)	for IP Relay)		3 speed dial buttons & a phone book for
01.001(0)(0)(1)(2)	lor ii rtolay)		contacts.
Three-Way Calling	TRS, STS, CTS,	Meets	Sprint supports LEC-based three-way calling
47 C.F.R. §	IP Relay (Waived		for its customers.
64.604(a)(3)(vi)(3)	for IP CTS)		
Interactive Menus &	TRS, STS, CTS,	Exceeds	Sprint electronically captures recordings &
Voicemail 47 C.F.R. §	IP CTS, IP Relay		makes interactive recordings & voicemail/
			answering machines available to Relay
04.004(a)(3)(VII)/(VIII)			
Emergency Calls for	TRS, STS (N/A	Meets	Sprint automatically & immediately connects
TTY-based providers	for CTS, IP CTS,		emergency calls to an appropriate Public
	IP Relay)		
	CTC (NI/A for	Cycoods	
		Exceeds	
			·
		N/A	
			services being offered.
64.604(a) (6)			•
		N/A	
		Fyceeds	
		LAUGGUS	
	IP Relay)		ASCII, Turbo Code, & Enhanced Turbo Code
			(E-Turbo).
I		Exceeds	
	IPCIS, IP Relay		
_			
	TRS STS CTS	Exceeds	
Carriers (IXCs)	CTS, IP Relay)		
TTY-based providers 47 C.F.R. § 64.604(a)(4) STS Called Numbers 47 C.F.R. § 64.604(a)(5) Privacy Screens 47 C.F.R. § 64.604(a) (6) International Calls Non-reimbursable 47 C.F.R. § 64.604(a)(7) ASCII & Baudot 47 C.F.R. § 64.604(b)(1) Speed of Answer & Blockage 47 C.F.R. § 64.604(b)(2) Equal Access to Interexchange	for CTS, IP CTS, IP Relay) STS (N/A for TRS, CTS, IP CTS, IP Relay) VRS VRS, IP Relay (N/A for TRS, STS CTS, or IP CTS) TRS, STS (Waived for CTS, IP CTS) (N/A for IP Relay) TRS, STS, CTS, IP CTS, IP CTS, IP CTS, IP CTS, IP Relay	Exceeds N/A	emergency calls to an appropriate Public Safety Answering Point (PSAP) which is capable of dispatching emergency services. Sprint allows STS users to register a Customer Profile which includes Speed Dial & other enhancements. This requirement is not applicable to the services being offered. This requirement is not applicable to the services being offered. Sprint IP has procedures in place to prohibit international usage. Sprint's TRS (TTY) platform supports all communication modes generally in use including Baudot (domestic & international), ASCII, Turbo Code, & Enhanced Turbo Code

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
47 C.F.R. § 64.604(b)(3)			support the billing & rating of toll calls through other carriers.
TRS Facilities 47 C.F.R. § 64.604(b)(4)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint provides mandated services 24/7 using redundant facilities functionally.
Technology 47 C.F.R. § 64.604(b)(5)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint exceeds the minimum mandatory services & routinely upgrades its products to increase functional equivalency.
Caller ID 47 C.F.R. § 64.604(b)(6)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint provides Caller ID. If not blocked by the customer, the number of the calling party is transmitted.
STS 711 Calls 47 C.F.R. § 64.604(b)(7)	TRS, STS (N/A to CTS, IP CTS, or IP Relay)	Exceeds	Sprint offers multiple solutions to meet this requirement include: Auto 711 Routing for STS users connects callers with a Customer Profile directly to STS CAs. CAs answering 711 for callers without a profile will immediately transfer the caller to a STS CA. Sprint offers a wireless short code to STS for Sprint wireless users. Sprint's 711 Interactive Voice Response (IVR) allows connectivity directly to an STS CA using the same level of prompts the IVR uses for other forms of TRS.
Consumer Complaint Logs & Procedures 47 C.F.R. § 64.604(c)(1)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint maintains 24/7 Customer Service & logs all complaints received. Sprint provides the State a summary that meets FCC standards.
Contact Persons 47 C.F.R. § 64.604(c)(2)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint's point of contact for complaints is Customer Service at: Sprint Relay Customer Service PO Box 29230 Shawnee Mission, KS 66201-9230 800-676-3777 (English) 800-676-4290 (Spanish) 877-787-1989 (Speech to Speech) 877-877-3291 (Fax)
Public Access to Information 47 C.F.R. § 64.604(c)(3)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint provides innovative Outreach services through state programs. The FCC does not allow IP Relay providers to include the cost of outreach in their yearly costs. Sprint continues to publicize the availability of IP services through promo materials, on-line marketing, & public service announcements. (Sprint does not include the cost of these activities in its yearly cost submissions to the FCC).
Rates 47 C.F.R. § 64.604(c)(4)	TRS, STS, CTS, IP CTS, IP Relay	Exceeds	Sprint ensures TRS/CTS users, who rely on Sprint's Relay platforms to establish billing for toll calls, are charged no more than traditional phone users.
Cost Information & Data Submission 47 C.F.R. § 64.604(c)(5)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint contributes to the Interstate TRS Fund & submits the required cost data to the FCC & to the Fund administrator to receive reimbursement.
Whistleblower Notice 47 C.F.R. § 64.604(c)(5)(M)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint has provided copies of the whistleblower protections to all of its employees including instructions for reporting noncompliance to the FCC's whistleblower hotline.

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
Complaint Resolution 47 C.F.R. § 64.604(c)(6)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint supports timely & effective complaint resolution.
Treatment of Customer Information 47 C.F.R. § 64.604(c)(7)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint does not use Customer Profile data for any purpose other than to process calls & will not sell, distribute, share, or reveal the profile data unless compelled by law. During State Relay transitions, Sprint does provide Customer Profile data at least 60 days prior to transition in usable format.
No Incentives to Use IP CTS 47 C.F.R. § 64.604(c)(8)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint does not offer incentives to IP CTS users directly/indirectly. Sprint prohibits incentives to hearing health professionals & does not have joint marketing arrangements with any hearing health professional.
IP CTS Registration & Certification 47 C.F.R. § 64.604(c)(9)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint complies with the final FCC rule requiring the collection of each new customer's name, address, telephone number, date of birth, & last 4 of SSN. Sprint collects a separate, self-certification for all new IP CTS users. Sprint maintains registration & certification records for at least 5 years after service ceases, & does not disclose registration & certification information, except as required by law/regulation.
IP CTS Default Settings 47 C.F.R. § 64.604(c)(10)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Sprint's default setting for the IP CapTel phone is to have captions on.
IP CTS Equipment Fee & Label 47 C.F.R. § 64.604(c)(11)	IP CTS (N/A to TRS, STS, CTS, or IP Relay)	Meets	Portions of this requirement were struck down at the conclusion of the DC Circuit Court ruling on Sorenson v FCC & no longer applies. Sprint fully complies with the remainders of the order to provide a warning label on all IP CTS equipment & software.
TRS calls requiring multiple CAs 47 C.F.R. § 64.604(c)(14)	TRS, STS, CTS, IP CTS, IP Relay	Meets	Sprint complies for VCO-VCO calls between multiple captioned telephone relay service users, IP CTS/CTS users & IP CTS users; CTS/IP CTS users & TTY users; CTS/IP CTS users & VRS users.
IP Emergency calling requirements 47 C.F.R. § 64.605	IP CTS, IP Relay (N/A to TRS, STS, or CTS)	Meets	Sprint's emergency calling service is in full compliance with the FCC's rules. For Sprint IP, Sprint handles & routes emergency calls to the applicable PSAP; immediately attempts to re-establish contact in the event of disconnection; automatically places 911 calls at the front of call queues; & obtains registered location info from its users. For IP CTS calls, Sprint provides captioning for emergency calls, & the customer's underlying carrier handles call routing & delivery to/from the PSAP. Sprint provides its users with methods of updating their registered locations.
Internet-based TRS Registration 47 C.F.R. § 64.611	IP Relay (N/A to TRS, STS, CTS, or IP CTS)	Meets	Sprint provides IP users the ability to register Sprint as their default provider. Sprint assigns 10-digit local numbers, routes, & delivers inbound & outbound calls. Sprint updates the TRS Numbering Directory for

FCC Minimum Standard	Applies to:	Compliant	Sprint's Approach
			users who select Sprint as their default IP provider, as required under the FCC. Sprint complies with all porting requirements. Sprint's promo materials include advisories for E911, processes for obtaining a number, number portability, & updating location information.

Training

Communications Assistant (CA)/Operator Training

Sprint knows a well-trained CA/operator has the skills and tools to provide the best customer experience. The education and continued development of all CAs/operators is an investment. Sprint's training has evolved over 26 years in the relay industry, however, Sprint's commitment to quality service has never wavered. Sprint's reputation as a TRS provider within the deaf, hard of hearing, DeafBlind, speech-disabled communities, and the general public comes from our CAs'/operators' commitment to providing quality service.

Training has been developed in coordination and cooperation with the relay user communities. CA/operator trainees must complete a series of scenario-based assessments, culminating in an on-the-job final assessment before graduating from initial training and handling relay calls. Training does not stop after the initial push. Employees continue to receive regular ongoing training to improve their skills and knowledge. Ongoing training and Quality Assurance programs are used as incentives to encourage competition between individual CAs/operators and call centers and encourage continued industry-leading quality.

Sprint listens to customers' feedback and takes proactive steps to implement changes to address suggestions and feedback. Sprint does not develop training and consumer education programs for the TRS in isolation. Sprint Accessibility contracts with members of the deaf, hard of hearing, and DeafBlind communities and individuals with a speech disability to jointly develop and present training for TRS. This is an important Sprint advantage. Sprint provides ongoing training to our CAs/operators on state-specific information including the names of local organizations, cities, and other common terms specific to the State. Sprint welcomes feedback from the State and its endusers.

During initial training, CAs/operators are trained and evaluated on how to accurately reflect the TTY user's intent and the CA's/operator's role in the Relay process. Training is provided on various levels of English/Spanish/ASL during initial training and throughout employment. In order to successfully complete initial training, the CA/operator must demonstrate competent skills to translate calls as requested. When training is complete, a CA/operator continues to be evaluated on translation skills through individualized monthly surveys.

Relay trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80 percent or better before being allowed to complete training and process Relay calls.

Sprint incorporates various instructional methods to enhance the trainee's ability to learn:

- Lectures
- Visual graphics
- Flow charts

- Videos
- Role-play scenarios
- Simulated on-line call handling
- Observation of live-call handling

Our policies and standards manual has been developed over the past 26 years. Sprint stresses the importance of all Relay policies and procedures at the interview/selection process and continues through initial and ongoing training and is currently being utilized and available for the Sate to review. An outline of these expectations is provided in the following table. This list is not meant to be a complete source and is subject to change.

	POLICY AND PROCEDURI	E TOPICS
Orientation	Welcome and Introductions	Internet Services
	 Introduction to Each Other 	 Product Distribution
	 Sprint (or Vendor Company) 	 The Sprint Campus (if applicable)
	Sprint Values	 Telecommunications Relay Service
	 Sprint Corp Overview 	What is Relay?
	 History of Sprint Corporation 	 Relay Agent Training
	 Local Telecommunications 	Relay - Connect to Your Future Video
	Wireless	Observation Guidelines
	VVII CIC33	 How a Call Reaches Sprint Relay
Connecting to Relay	The Role of a Relay Agent	0 1 1 1 0 1 1 1 1 1 1 1
Connecting to Relay		 Sprint IP user connects to Agent but wants Customer Service
	Connecting to Relay	
	• 711	Sprint IP Two Line VCO
	Dedicated Toll-Free Numbers	Fed IP Relay
	Equipment	• Fed IP Relay call processing
	♦ TTY	◆ Fed IP Relay Reporting
	TTY Basics	• Fed IP Relay variations
	TTY Etiquette	 Sprint/Fed IP Relay International Calling
	 Closing a Conversation 	 Sprint/Fed IP Variations
	 Agent Responsibility 	 Sprint/Fed IP Fast Busy
	Call Set Up	 Sprint/Fed IP 2-Line VCO
	Call Closing	 Sprint/Fed IP Conversation Lag Time
	 TTY to Voice Closing a Conversation 	 Sprint/Fed IP Interrupts
	Operator Role Closure	 Voice Mail Greeting
	Operator Close Protocol Guide:	Cellular & Wireless Phones
	Disallowed Calls	 Video Relay Service
	 Glossary of Abbreviations & Terms 	Devices & Pagers
	TTY Practice Session	TTY Public Payphone
	 Auto-Corrected Abbreviations 	Sprint National Relay
	 Standard Abbreviations 	Sprint International
	Typing Variations	Inbound international calling
	 Internet Characters 	Sprint International Variations
	l	Non-Standard TTY
	Verbatim - Style Contraction Shalling	Outbound International calling Transfer Menu
	Contraction Spelling	
	Punctuation	• Reseller call processing
	Agent/Operator Role	• CapTel
	♦ SKSK	→ Relay-CapTel
	 Background Noises while TTY user is Typing 	◆ CapTel-Relay
	 Typing Monetary Units 	◆ CapTel Transfers
	→ 711	 Dedicated State CapTel Transfer
	 TTY Garble During Typing 	 Alternate Languages
	 XXX to Correct Typing Error 	 Spanish Language Customer Service
	Other Communication Devices	Relay Caller ID
	 Data Transmission Speed 	True Caller ID
	Turbo Code	Per Call Block

	POLICY AND PROCEDURE	TOPICS
	Turbo Code Interrupt	Per Line Block
	• Enhanced Turbo Dial Thru - (ETurbo)	Permanent Call Blocking
	 Disable Turbo Code Mode 	Caller ID Blocking - True Caller ID
	American Standard Code Information	 Connecting Variations
	Interchange (ASCII)	Misdialed Relay Phrase
	ASCII Interrupts	 Dialed 711 Instead of 911
	 Sprint IP - Internet Relay 	
	·	711 Spanish Daywart for Palau Nambara
	Sprint IP call processing Internet Palauveriations	Request for Relay Numbers
	Internet Relay variations (CA) is anti-one.	Cellular/Wireless problem reaching 711
	• 'GA' is optional	611/811 (LEC Service Access)
	Sprint IP Standard Svc Explanation	→ 700
	Text Flow	 900 Numbers & Call Processing
	 Interruptions without garble 	 Correctional Facility/Prison Calls
	 Conversational flow 	 Use of Relay through Correctional Facilities:
	 ASL Emoticons – Text Message Abbreviations 	Correctional Facility Call Processing, Relay Abuse
	 IP Acronyms 	 Spanish & French Language Service
	 Sprint IP Variations 	 International calling restrictions
		Info Digit list
		911 Emergency Calls
Overview of System	System Overview	Dial Window
& Equipment	Login/Logout	Scratch Pad
=	Agent Profile	Transfer Panel
		Headset Panel
		Status Bar
	Dragging/Dropping Capy/Dasts	
	Copy/Paste	Record Feature Function Keys
	Drop Down Boxes	Function Keys
	• Lists	♦ Block
	 Radio Button 	Ctrl-Switch
	◆ Scroll Bars	◆ Switch
	→ Sliders	 The Keyboard
	 Tables 	 Alpha Keys
	 Accessing a Program 	 Call Handling Keys
	 Screen Displays 	Numeric Keys
	Call Handling Screen	Cursor Movement Keys
	Title Bar	Arrow Keys
	◆ Banner	Backspace
	 Conversation Area 	Error Correction Function
	Disconnect Message Status	Single Word Edit Function
	Color Scheme	Word Substitution Feature
	Agent Text Transmission Cancel Key	Macros Table Ctd Function Kove
	• Cancel Key	Ctrl-Function Keys Classer of Talankana Tarras
	Information Bar Destile	Glossary of Telephony Terms Declarate of Malace
	◆ Profile	Background Noises
	♦ Help	 Voice Tones/Descriptive Words
	Call Type	 Standard Abbreviations
Phone Image	 Professional Phone Image 	 Voice Person Speaking in Third Person
(Tone of Voice)	 How phone image is created 	 Pacing the Voice Customer
	 Provide warm & friendly greeting 	Brief pacing phrases
	 Conversational Tone 	Repeating information
	 Voice Inflection 	 Voice Customer does not say "GA"
	Audibility & breath control	 Handling Interruptions
	Pitch	 Voice Tone
	• Quality	 How Phone Image is Created
	*	
	Operator Role Polov Polo	 Why Conversational Tone? Transparance Caller Control & Confidentiality
	Relay Role Relay Skills	 Transparency, Caller Control & Confidentiality
	Relay Skills	• Rudeness
	Conversational Flow	Create an Exceptional Customer Experience
	 Staying focused 	 Announce

	POLICY AND PROCEDUR	RE TOPICS
	Listening skills	◆ Closing
	Customer service skill	 Suggested Redirect Phrases
	Coping skills	Transparency & Caller Control
	Phrases	Transparency a canor control
	Background Noises	
	 Voice Tones/Descriptive Words 	
TTY-Voice &	TTY to Voice Introduction	TTY-Voice Busy Signals
Voice-TTY	Connecting to outbound customer	Regional 800
	Announcement	Voice-TTY ✓
	Explanation of service	 Voice-TTY Introduction
	 Deaf or Hard-of-Hearing Explanation 	 Connecting to the outbound customer
	 International Announcement 	Voice Greeting
	TTY-Voice Procedures	Voice call progress
	 TTY-Voice Specific Person Request 	• Announcement
	 Variations Specific Person Request 	 Voice-TTY call (Hearing Person Answer)
	TTY-Voice Answered TTY	Explanation of service
	 Voice Person Not Available 	 Voice-TTY Procedures
	TTY-TTY Call Release	 Voice-TTY Specific Person Request
	TTY-Voice Answer TTY (TTY-TTY)	 Voice-TTY Answered Voice
	TTY-TTY Specific Person Request	 Voice-TTY No Answer
	TTY-Voice No Answer	 Voice-TTY Busy Signal
	 Types of Busy Signals 	3 3
	Redialing	
Branding	Inbound Answer Type Branding	Branding procedures
Ŭ	Database Branding	31
Recordings,	Introduction	◆ AMR
Answering	Recording Feature	 TTY-Voice Pager/Beeper (known)
Machines, Pagers, &	 Information Line Recording (TTY/ Voice) 	 TTY-Voice Pager/Beeper (unknown)
Answering Machine	Touch Tone Dialing	→ Voice-TTY Pager
Retrieval (AMR)	 Using Touch Tones (TTY/Voice) 	 Voice-TTY Answering Machine
	Audio text interaction	 Other Recording Variations
	 Variations for Recordings 	 Voice Mail System
	 Record Feature Tips 	 Privacy Manager/Call Intercept
	 TTY-Voice Recordings 	 Automatic Redial System Recordings
	 TTY-Voice Recording Information 	 Switchboards
	 TTY-Voice Answering Machine 	 Redialing Voicemail through Switchboard
	 Variations: Answering Machine/ 	 TTY-Voice Asking for Specific Person
	Recording/Pagers	 Live person On Answering Machine Redial
	Voice Mail Retrieval	
VCO	VCO Introduction	 Reverse 2LVCO Intro
(Voice Carry-Over)	VCO Announcement	♦ Reverse 2LVCO Procedure
	 VCO Service Explanation 	 VCO Variations
	 VCO Equipment 	 VCO comes in Voice Line
	Non-Branded VCO	2LVCO Conference Calls
	Branded VCO	 VCO Requests Relay to give Relay #
	VCO No Answer	VCO Privacy while leaving message
	◆ VCO Busy	VCO Voice Mail Retrieval
	VCO Privacy	2LVCO Voice Mail Retrieval
	VCO Answering Machine VCO Answering Machine	VCO Types and Voices
	Voice-VCO Answered TTY	Inbound Customer Requests VCO/HCO
	Voice-VCO Answered VCO	 VCO Requests CA gives name in notes
Dilli	Two-Line VCO (2LVCO) Intro	2LVCO Procedure
Billing	• Introduction	Inbound tells wrong #
	Local call description	 Agent dials wrong #
	Paid by Inbound	→ Marine
	Toll Free Calls	Roaming Feature
	 Calls that Cannot Be Processed 	 Restricted Roaming

	POLICY AND PROCEDUR	E_TOPICS
	Specific Person Request	 Unrestricted Roaming
HCO	HCO Intro	Voice-HCO Answered
(Hearing Carry-Over)	HCO Announcement	 Voice-HCO Answered TTY (1) (2)
	HCO Service Explanation	 Voice-HCO recorded message answers
	 People with speech disabilities "S" 	2LHCO Intro
	Non-Branded HCO	Two-Line HCO Procedure
	Branded HCO	Reverse Two-Line HCO
	HCO with Privacy	 HCO Variations
	HCO No Answer	 Inbound requests VCO/HCO
	HCO Busy	 HCO User Requests to Speak
	 HCO-Voice Answering Machine 	
Customer Database	 Enhanced Customer Database Profile 	Customer Profile Introduction
	Household Profile	 Use/Edit/New/Delete Customer Profile
	Edit Household Profile	 Verify Customer Password for Agent
	Navigating Customer Database	 Verify Customer Password – CSR Only
	Household Profile Panels	Customer Profile Panels
	 Frequently Dialed Numbers 	 Personal Information
	 Preferences 	◆ Notes
	 Restrictions 	 Frequently Dialed #s
	→ Blocked	Emergency #s
	Emergency Numbers	♦ STS
	♦ STS	◆ STS Messages
	◆ STS Messages	 Database Profile Macros
Directory Assistance	DA Intro	Call Processing Calling from International
(DA)	1	Number
(DA)	Interstate DA	
	Intrastate DA	Sprint International Variations
	 Automated DA 	 Non-Standard TTY
	 DA City & State Given; Area Code Unknown 	 Answered Foreign Language
	 DA Variations 	 Transfer Menu
	 International Transfer Menu 	 900 # Call Processing
	Call Processing Calling Intl	• 211/311/511 Requests
Device-to-Device	Device to Device Intro	◆ VCO-HCO & HCO-VCO
Calls	Function Keys & Banner Messages	HCO-HCO
Jano	◆ VCO-TTY & TTY-VCO	Device to Device Variations
	♦ VCO-VCO	 Alternate Call Type reaches recording
0.11.0	◆ TTY-HCO & HCO-TTY	
Call Processing	CA information	 Request for Length of Call
Variations	 Area Code Only In From Number 	 T-V Call & V Requests Supervisor Call Backs for
	 Conversational Flow 	TTYs
	 Static or Poor Connection 	 Multiple Calls
	 Profanity towards Agent 	 Sensitive Topics
	• Redialing	• Suicide
	◆ Young Children	◆ Abuse
		◆ Illegal Calls
	Inbound Does Not Connect	
	♦ Inbound ASCII	Answering Machines
	 Tone Judgments 	 Hangs Up Before Message Left
	 Repeating Information 	 Do Not Type Recorded Messages
	Restricted Calls	 Answering Machine Full
	 Two calling from numbers 	 Change Answering Machine Message
	LEC Service Office	 VCO Requests Leave Message 1st out dial
	◆ 611/811	◆ Leaving a Message V-TTY Ans V
	Double Letters	Retrieving Messages from TTY V Answering
		Machine
	Call Waiting Feature	
	Conference Calls	TTY Screener
	Party Line Calls	 Request to Leave TTY Message on Answering
	 Three-Way Calling 	Machine
	 Hard of hearing customer Answers TTY Line 	 Recordings
	<u> </u>	Regional 800

Spanish Calls to Spanish Speaking Agents Request for Alternate Language Caller Types in Atternate Language Voice Customer Hangs Up During Call Variable Time Stamp Customer Misolaider Phrase TITY Customer Hangs Up During Call Non Standard TTY Capability Relaying Internat Characters TITY User Does Not Type GA Dispatch Calls — Pizza Task etc. Customer Request Customer Requests Holding for Indound prior to datal Request for Company Information Request for Majernat Request for Company Information Request for Relay Number Customer Requests to Call Relay Service Request for Calling from Number Request To Pocadures Procedures Procedur		POLICY AND PROCEDUR	E TOPICS
Request for Alternate Language			
- Caller Types in Alternate Language - Voice Customer Hangs Up During Call - Variable Time Stamp - Customer Misdaled Phrase - TTV Customer Hangs Up During Call - Non Standard TTV Capability - Relaying Internet Characters - TTV User Does Not Type GA - Dispatch Calls - Puza Taxi, etc Oustomer Referral Guidelines - V-T Calls answered by Fax - Oustomer Requests - Holding for hobound prior to out dial - Request for Company Information - Request F			
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Request for MIF Agent			 VCO Types & Voices
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 Consistency Patience Ask Yes/No Questions STS-TTY Non-branded HCO-STS STS-HCO 			
 Patience Ask Yes/No Questions Non-branded HCO-STS STS-HCO 		 STS Agent Tools 	◆ TTY-STS
 Patience Ask Yes/No Questions Non-branded HCO-STS STS-HCO 			♦ STS-TTY
◆ Ask Yes/No Questions◆ STS-HCO			
		 Ask Yes/No Questions 	
		No Personal Conversation	◆ STS Hold Message

	POLICY AND PROCEDURE	TOPICS
	Phrases	 STS Call Takeover
	STS Alphabet	 Confidentiality & Transparency
	 Transparency/Call Control/ Confidentiality 	 Personal Conversations requests
		 STS Variations
Healthy Detachment	Healthy Detachment Intro	 Perception
Trouning Dotaoriinoni	Objectives	Ways to Reduce Stress
	Survival Skills	Ways to Reduce StressHospitality
Hoolthy Doloy	Relay Traps	
Healthy Relay	Introduction	Setting up Workstation
	Objectives	GUAM - Get Up and Move
	 Ergonomics 	 Ergonomic Relief
	 Stretching Exercises 	 Slowing the Customer Down
	 Agent Reinforcement 	 Overtime
	 Ergonomic Review 	 Relaxation
Adult Learner	 Understanding the Needs of the Adult Learner 	→ Modeling
	The Learning Continuum	Checking For Understanding
	 Use of Different Modalities 	Guided Practice
	 Edgar Dale's Cone of Experience 	 Independent Practice
	Elements of Lesson Design	• Summary
	Focus	• Evaluation
	 Objective & Purpose 	How to Give Effective Instruction
	• Input	Questioning Guidelines Feedback Training & Cooching Technique
A .	Trust in Management	Feedback - Training & Coaching Technique
Assessing	 The Assessment Process in Training 	 Acceptable Time Frame
Performance	Assessment - What is involved?	 Acceptable Is Relative
	 Practice Time 	Ways to "Coach"
	 Spelling Test 	 Feedback
	 Written tests 	 Maintain Self-esteem & Motivate
	 Side by side evaluations 	 Pass/Fail Guidelines
	◆ Typing	 Introduce Assessment Form
	31 3	◆ Form Set-Up
Introduction to	Introduction to Diversified Culture	Why is there Deaf Culture?
Diversified Culture	Diversification	 What Do You Know About Deafness
	Who Uses Relay	 Myths About Deafness
	Understanding Our Customer Special Communication Needs	Two Views of Deafness Leadness Leadness
	Special Communication Needs	Loudness Levels
	 Pathological vs. Cultural View of Deafness 	Characteristics of Deafness
		The Deaf Community
Deaf Heritage	 History in Europe 	 Edward Miner Gallaudet
	 History in North America 	 Oral/Combined Debate
	 Alexander Graham Bell 	 Timeline of Deaf History
The Deaf Community	 Introduction to the Deaf Community 	 American Athletic Association of the Deaf
,	 National Association of the Deaf 	 National Theatre of the Deaf
	 Contributions to Society 	 Assistive Devices
	Mainstreamed Schools	 Gaining Acceptance in the Deaf Community
	 Sign Language Interpreters 	 Changes in the Deaf Community
	 Different Communication Systems 	 Working with a Sign Language Interpreter
	Exposure to English	
	DEAF President Now Attitude Changes toward the Deef Community	• Equal Access
A ' C'	Attitude Changes toward the Deaf Community	Cochlear Implant Controversy
American Sign	What is ASL?	 Rules of ASL
Language (ASL) Pt.	 History of ASL 	 Five Parameters of ASL
1	 ASL Recognized as Language 	 English vs. ASL Idioms
American Sign	 Evolution of ASL 	 Translate ASL to English and Vice Versa
American Sign Language (ASL) Pt.	Evolution of ASLASL Syntax	Translate ASL to English and Vice Versa

	POLICY AND PROCEDURE TOPICS			
TTYPhony & TTY Courtesy	First TeletypewriterEvolution & History of the TTYTelecom Laws of Accessibility	TTY CourtesyDevelopment of Relay Service Market		
Deaf Customers	 Statistics from NIDCD 	 Relaying for Deaf Customers 		
Hard of hearing & Late-Deafened Customers	 Characteristics of Deaf Customers Assistive Devices for Deaf Customers Establishment of Assoc. of Late-Deafened Adults 	 Establishment of Hearing Loss Association of America Deaf Seniors Military Veterans Relaying for Late-Deafened Customers 		
DeafBlind Customers	 What Does DeafBlind Mean Assistive Devices for the DeafBlind Relaying for the DeafBlind 	DeafBlind Pacing – Allows the CA to slow down the transmission to the Braille machine		
Relaying for Speech/ Cognitively Disabled Customers	 Speech-Challenged Customers Assistive Devices Physically &/or Cognitively Challenged Customers 	Traumatic Brain InjuryStrokeCommunication Related Effects		
Relaying for Hearing Customers	• Statistics			
Ethics & Confidentiality	 Interpreting Standards ADA & FCC regulations for the Provision of TRS Regulations pertaining to call content 	 TRS Rules – Operator Standards Relay Center Agreement Regarding Confidential Customer Info 		

On-Going Quality Focus Skill Training

Continuous skill training is the cornerstone of Sprint's training program. Core relay processing skills are continually reinforced throughout employment and as a part of supplemental training programs. Sprint develops skills training programs and on-going training labs to ensure skills are maintained and remain consistent with basic relay training. Refresher training is provided on correct relay procedures including system navigation, standard procedures, professionalism, and ethics. Depending upon the complexity of the training a decision is made to determine the appropriate delivery. Our on-going skill training program includes:

- Quality Focus Skill training monthly
- Diversified Culture Awareness training monthly
- Customer Service Initiative monthly
- Check for Understanding monthly
- Grammar and Spelling Rules bi-annual

Quality Focus Skill Training topics from 2016/2017:

Jan 2016	Dialing the correct number within 5 seconds	
Feb 2016	Typing the Voice/TTY greeting verbatim, Announcement protocol including a prompt state-specific	
	announcement/greeting used/ ID number given	
Mar 2016	Call processed according to procedures, specifically following Customer Note instructions	
Apr 2016	State-specific announcements/greeting/ID given, Call closing protocol, Appropriate closing and	
	macro for call type	
May 2016	Specific person request announcements, Progress of call/Customer Informed	
Jun 2016	Call transfer procedure, Adapting to call procedures changes as directed by the customer.	
Jul 2016	Typing greeting verbatim, Typing message verbatim, Voicing the complete message	
Aug 2016	Maintaining transparency maintained, Typing messages verbatim	
Sept 2016	Dialing efficiency and protocol	
Oct 2016	Typing/reading voice/device answer greetings verbatim, Call closing procedure, Relay mode closing	
	protocol, Operator mode closing protocol	
Nov 2016	Changing call procedures as directed by customer, Appropriate macros use., Non-branded VCO call	
	type setup	

Dec 2016	Call type standard procedure, Modifying call procedure as directed by the customer, Transferring	
	(711 customer request)	
Jan 2017	Dialing the correct number within 5 seconds	
Feb 2017	Determining familiarity with relay services, Call type appropriate service explanations, Appropriate	
	macro use (EXPLAINING RELAY)?	
Mar 2017	Following customer note and customer typed Instructions	
Apr 2017	Announcement protocol including a prompt state-specific announcement/greeting used/ID number	
	given, Call closing protocol, Appropriate closing and macro for call type.	
May 2017	Specific person announcement procedure	
Jun 2017	Call transfer procedure, Adapting to call procedures changes as directed by the customer, 711	
	transfer compliance	

Ongoing Diversified Culture Awareness Training

Training continues to bring focus to serving relay customers and disability awareness. Sprint provides additional training in Diversified Culture in conjunction with each state's local deaf, hard of hearing, Deafblind, late deafened and speech-disabled communities to identify knowledgeable presenters to promote ongoing training. These resources, in coordination with trainers ensure all materials presented are appropriate to continuing to broaden employees' understanding and effectiveness. Sprint will utilize live presentations, videos, audio recordings, role-plays, group activities, written materials, and/or discussion groups to deliver ongoing Diversified Culture training. As a part of ongoing Diversified Culture Training, each employee is required annually to review the ethics and confidentiality requirements and sign an agreement of understanding.

Diversified Culture Awareness Training topics from 2016/2017:

Jan 2016	Diversified Culture-What's That? Diversification in Communication, Considerations, Who uses the relay service? Why is it important for us to understand our customers? Why is it important for us to recognize their special communication needs?
Feb 2016	The History of Deafness
Mar 2016	Ways to Detach
Apr 2016	Deaf Nation Expo is
May 2016	American Sign Language is, CODA means
June 2016	All About CapTel, How it works
July 2016	Baseball Signs originated from Sign Language
Aug 2016	Accessibility for All, Sprint corporate responsibility
Sept 2016	Diversity-Equality-Inclusion
Oct 2016	Disability is Diversity, Stretches to do at your desk
Nov 2016	Disability Awareness
Dec 2106	Disability Advocacy
Jan 2017	View of a person's abilities
Feb 2017	Highlight: Edward Verne Roberts – American Disability Activist
Mar 2017	Disability Awareness
Apr 2017	Parkinson's Awareness Month
May 2017	Limb Loss Awareness Month

The following is an example of the monthly Quality Focus Check for Understanding from March 2017.

Check For Understanding Quality Focus March 2017

Please return to your supervisor by March 7, 2017.

Nar	ne	Supervisor	
1)	What is the first thing an agent :	should look at when a c	all comes to their station?

- If a customer requests that the agent verifies the Calling To number before dialing out the agent should type or say something like,
 The IP Call number to dial is entered by the inbound, therefore you DO NOT need to verify the Calling To number before outdialing on an IP call, even if it's in the Customer Notes to do so. TRUE FALSE
- The record feature may be used on conference calls.
 TRUE

 FALSE
- 5) If the customer has TYPE RECORDINGS as a preference or instruction the agent should not _. This instruction indicates that the customers the agent to type the recording
- If a device user requests that you do not announce relay, the agent should:
 - a) Not identify that this call is through a relay service or ask if the voice person has had a relay call before.
 - b) Inform the customer they must answer the question (HOW WOULD YOU LIKE YOUR CALL ANNOUNCED Q) GA.
 - c) Inform the caller they are required to announce the call.
- 7) What is the purpose of the customer notes?
 - To assist the agent in processing the call how the customer prefers.
 - b) To annoy the operator.
 - c) To ensure the customer does not have to repeat their instructions before every call.
- d) Both A and C.
 When using <ALT .>, agents should send it:
- a) Only once and then pause a few moments before sending it again.
- b) Twice and then pause a few moments before sending it again
- c) As many times as they want since they are in the buffer and can be canceled when the phone is answered.

TTY/ASL Refresher	Provide examples of how to relay the statements	
" TIME WHAT Q		
" GO PARTY YOU Q		

Customer Service Initiative (CSI) program: A discussion of support techniques to enhance service for customers and an avenue for sharing relay agent peer to peer suggestions toward accomplishing superior service. 2016/2017 CSI topics are provided in the following table.

Jan 2016	Use of "Deaf/hard of hearing" and/or "internet service" in announcements.
Feb 2016	Outdial time, Inappropriate use, Veterans and hearing loss
April 2016	Sprint IP go ahead, Keeping the caller informed, Facilitate communication
May 2016	Procedure for recordings, Chemotherapy and hearing loss
Jun 2016	Caller control, Keeping the caller informed, Announcements, FCC verbatim requirement, State requirement call customization request
Jul 2016	Solicitation for agent process improvement suggestions, Caller control
Aug 2016	Call closure, Equal communication access
Sep 2016	Call processing reference information, Sprint Relay customer care, Speed of service recognition
Oct 2016	Brief service explanations, Call handling tips from agents
Nov 2016	Customer commendations, States and capitals review
Dec 2016	System enhancement prioritization
Jan 2017	Customer instructions, FCC call take over rule, Transparency
Mar 2017	Transparency, Caller control
Apr 2017	Customer notes, Operator/Relay mode, Call handling tips from agents
May 2017	Stress management

The following is an example of our bi-annual Grammar and Spelling Rules from 2016/2017.



Homonyms (also called homophones) are words that sound like one another but have different meanings. Some homonyms are spelled the same, like bark (the sound a dog makes) and bark (the outer layer of a tree trunk).

I and Me Usage

	when to rise	Example Sentence	HOW to test:
I	when you're reterring to the subject of a sentence or clause	Julia (subject) and / (subject) always go together.	To know if you should use "I" or "me" take the other pronoun out of the sentence and see if it still makes
Me	when you're reterring to the object of a sentence or clause	will you (subject) be coming with me (object) to the store?	sense.

Examples:

ī

Harry and I/ me went to the store.
Test: Me went to the store (Incorrect!)
Test: / went to the store. (Correct!)

Jake Invited Brian and I/ me over for dinner.
Test: Jake Invited / over for dinner. (incorrect!)
Test: Jake Invited me over for dinner. (Correct!)

Me

Will you take my brother and lime to the movies?
Test: Will you take / to the movies? (Incorrect!)
Test: Will you take me to the movies? (Correct!)

Sam, Jennifer, and Vime went to the beach.
 Test: //e went to the beach. (Incorrect!)
 Test: / went to the beach. (Correct!)

There, Their, and They're Usage

pronounced the same	winer to use	How to Test	
ı nere	Naming a place, a thing, or the existence of something	it you can replace "there" with "nere" you have it right:	
Ineir	Snowing possession	if you can substitute their with four you have it right:	
rney re	Compining the words "they" and "are"	"I ney" is a pronoun and "are" is the vero. If you can substitute "We are" you have it right!	

Have and Has Usage

	Singular	Plural	Hint
7" Person	I nave	we nave	"Have" and "nas" are both present tense conjugations of the verb "to have", and we use
2~ ⊬erson	You nave	You nave	"have" or "has" depending on the subject. If the subject is 3" person singular, then you use
3~ Her30⊓	He/Sne/It nas	iney nave	"has". All other subject take on "have".

It's and Its Usage

	ma na o sage		
	when to rise	How to rest	How to rest
lt's	when you're about to describe something	жеріасе with "it is"	ir you can replace hirs: with hit is: you have it right! Otherwise do not use punctuation.
lts	when you want to indicate ownership of something	Replace with another possessive adjective ("her," "his," "their") or "the"	and particularies

Ten Common Spelling Rules			
Rule	Examples	Memorize	
1. 'ie' or 'ei' White i before e, except after c White ie after a for words with a sh sound. Write ei when the vowels sounds like an a as in 'weigh' 2. 's' or 'es'	Onchieve, believe, friend receive, receipt, perceive Oncient, efficient, sufficient, conscience Oneighbor, vein, reign, rein, deign	Exceptions: Words like counterfeit, either, neither, height, leisure, forfeit, foreign, science, species, seize, weird Exceptions:	
Add es if a word ends in oh, sh, ss, x or z Add es for most words ending in o	One of the section of the secti	Words like altos, duos, pienos, radios, solos sopranos, studios, videos, typos	
 'y' to 'i' or not For words ending in y preceded by a vowel, retain the y when adding s or a suffix. For words ending in y, retain the y when adding log. For words ending in y, preceded by a consonent, change the y to i before any other suffix 	convey > conveys, employ > employer try > brying, justify > justifying, certify > certifying, study > studying try > bried, justify > justifies, certify > certifiable, mystify > mystified, laboratory > laboratories	Exceptions: Words like dryness, shyness	
4. drop the final 'e' DROP the e when the suffix starts with a vowel. DROP the e when the word ends in dge. DROP the final e when adding -ing	Osave > soveble, use > useble Ojudge > judgment Osave > soving, manage > managing, trace > tracing, emerge > emerging	Exceptions: DO NOT DROP the e if the word ends in ce or ge (e.g. manage > manageable, trace > traceable)	
 5. "t" or "tt" when adding -ing, -ed and some suffixes to verbs DOUBLE the t for verbs of one syllable with a single yourd, or a short yourd sound. DOUBLE the t for verbs of more than one syllable when the stress is on the last syllable. 	Orat > rotting, rotted, rotten fit > fitting, fitted knot > knotting, knotted Oabet > abetting, abetting allot > allotting, allotted commit > committing, committed emit > emitting, emitted forget > forgetting, forgotten (but forgetful)	Exceptions: DO NOT DOUBLE the f for verbs of one syllable with a double vowel or a long vowel sound (e.g. treat > treating, treated; greet > greeting, greeted)	
 6. 'r' or 'rr' when adding -ing, -ed and some suffixes to verbs DOUBLE the r for verbs of one syllable when the final r is preceded by a single vowel. DOUBLE the r for words of more than one syllable when the stress does not fall on the first syllable. 	Ostar > staming, starred, starry tar > taming, tarred war > warning, warred (but warfare) scer > scerning, scarred stir > stiming, starred Oconcur > concurring, concurred, concurrence cocur > occurring, occurred, occurrence defer > deferring, deferred, (but deference) deter > deterning, deterring, deterrent inter > inferring, inferred, (but inference) prefer > preferred, preferring, (but preference) refer > referred, preferring, referred	Exceptions: DO NOT DOUBLE the r for verbs of one syllable when the final r is preceded by a double vowel (e.g. fear > fearing, feared) DO NOT DOUBLE the r for words of more than one syllable, when the stress falls on the first syllable (e.g. prosper > prospered, prospering)	
 'C or 'If' when adding -ing, -ed and some suffixes to verba DOUBLE the / when it is preceded by a single vowel. 	cancel > cancelling, cancelled, cancellation fulfil > fulfilling, fulfilled, fulfillment level > levelling, levelled brovel > travelling, travelled, braveler /braveler	Exceptions: DO NOT DOUBLE the / when it is preceded by a double vowel (e.g. conceal > concealing, concealed)	

Staff Training

Our entire Accessibility team exists for our customers. Training on all aspects of ASL, deaf culture, the needs of hearing, speech and dual sensory impaired users, ethics and confidentiality is vital to our success. These topics and others help us to be able to meet and exceed customer expectations and requirements.

All Sprint employees are required to take ethics and confidentiality training. The Sprint Code of Conduct is applicable to Sprint employees and its controlled subsidiaries, the Sprint Board of Directors and anyone we authorize to act on Sprint's behalf. The Code establishes the basic foundation of Sprint's ethics by communicating our philosophy and commitment to all of our employees, customers, other stakeholders, and the communities in which we do business. The Sprint Code of Conduct outlines our ethical and legal responsibilities as employees, as well as our interactions with customers, competitors and suppliers. One of our most valuable assets is our reputation for honesty and fairness, and our commitment to uphold this responsibility. The Code is

a go-to resource when questions of legal or ethical appropriateness arise. We are bound by the Code and the specific operational policies of Sprint. Annual Code certification is required. Sprint also maintains an Ethics Helpline, a 24-hour resource for employees and other stakeholders to confidentially and safely seek advice or report any suspected violation of the Code of Conduct, such as fraud, sexual harassment, discrimination, or any illegal conduct in the workplace.

Sprint staff members are also required set annual corporate training and development goals. Individual performance is measured and tied to compensation. Ongoing Staff Development is also key to overall staff performance. Sprint's Accessibility Customer Solutions (ACS) group hosts an interactive meeting called the Sprint Accessibility Café. This monthly meeting is an opportunity for the Accessibility Team to share market and industry product updates. Presenters from outside the group and subject matter experts from the Relay industry also provide updates.

Appendix C: TRS Pledge of Confidentiality

Sprint's reputation as an ethical company is the key to enabling us to be the preferred communications company – a place that delivers the best experiences for employees, end users, and state customers. Throughout initial and on-going training, communications assistants (CAs)/operators receive information and guidelines on professional conduct with an emphasis on ethics and confidentiality, based on Sprint's "Relay Center Code of Ethical Conduct" and "Principles of Business Conduct." CAs/operators are presented with possible situations involving ethical issues and are taught how to apply the conduct guidelines to each situation.

All Relay center personnel are required to sign and abide by a pledge of confidentiality that promises not to disclose the identity of any caller or any information learned during the course of relaying calls. In conjunction with signing Sprint's confidentiality agreement, as a part of training, CAs/operators role-play various scenarios which teach the correct way to ask for assistance from a supervisor without divulging call-specifics. Examples of confidentiality breaches are reviewed and discussed with the CAs/operators.

Sprint strictly enforces confidentiality policies in the center, which includes the following:

- Prospective employees are screened during the interview process on issues regarding ethics and confidentiality.
- On day one of training, employees must sign a Pledge of Confidentiality Agreement Form.
- During initial training, employees are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive three hours of training on healthy detachment.
- After graduation from initial training, employees are reviewed yearly on the Pledge of Confidentiality and are required to re-sign promises not to disclose the identity of any caller or any information learned during the course of relaying calls.
- Breach of confidentiality may result in termination of employment.
- All Sprint Accessibility Centers have security key access.
- Visitors are not allowed in work areas.

Sprint Code of Conduct

The Sprint Code of Conduct describes the ethical and legal responsibilities of employees of Sprint and anyone we authorize to act on Sprint's behalf. Sprint and all TRS employees (including Communication Service for the Deaf [CSD] staff) are required to annually certify that they understand and will comply with the established code of conduct. The certification tool and process requires employees to affirm their understanding and compliance of Code of Conduct expectations regarding Ethics, Inclusion and Diversity, Information Security, Insider Trading, Privacy, Records Management, Safety and Preparedness, and Time Reporting. The section on Ethics includes a Helpline for employee resources allowing them to confidentially and safely seek advice or report compliance violations.

The Sprint Code of Conduct covers all the serious concerns of a whistleblower policy, which is intended to encourage and enable employees and others to raise questions/concerns and seek resolution. It is explicitly stated in the Sprint Code of Conduct all employees and others are obligated to report violations or suspected violations. Additionally, Sprint has an explicit retaliation policy in which an employee who retaliates against someone who has reported in good faith or assists in an

investigation may be subject to corrective action up to and including termination. This information is contained within Sprint's Code of Conduct all employees are required to complete annually.

There is a TRS whistleblower protection notification posted at Sprint TRS call centers in accordance with FCC rules. CSD also obtains a signed acknowledgement of the receipt of the Whistleblower Policy from all employees upon hire, and annually thereafter.

Training on Ethics

Sprint Relay employees receive training on the appropriate protocol to protect relay users' privacy and how to prevent the unintentional disclosure of relay communications. When trainees observe calls and ask questions once back in the training room, trainers lead a discussion on the appropriate method to seek clarifications without divulging confidential information. CAs/operators may also role-play various scenarios which demonstrate the correct way to request assistance from a supervisor without divulging call-specifics. Examples of ethical issues and challenging circumstances are reviewed and discussed with CAs/operators. During initial training, CAs/operators are required to pass a series of written and skills-demonstration tests, which include their understanding of the Relay Center Code of Ethics and how to apply the Code to hypothetical situations. Trainees who do not pass these tests are not utilized as CAs/operators.

Sprint's high-performance culture focuses on accountability, first and foremost, along with open communication and innovation. Within these traits, integrity and ethics are critical success factors. Amidst unprecedented change and technological advancement, acting with integrity is not just the right thing to do; it is the unwavering foundation for Sprint.

Confidentiality

Sprint believes measures to ensure confidentiality are crucial to the success of TRS operations and has implemented procedural and environmental measures to safeguard customer and call information. Sprint has policies in place to protect users' confidentiality. These policies establish high standards for ethical behavior and employees are subject to disciplinary action, including termination of employment, for violating ethical and confidentiality standards.

Sprint employees receive training on confidentiality and ethics. Employees are trained to understand why confidentiality is important, how to protect confidentiality, the appropriate protocol to protect relay users' privacy, how to prevent the unintentional disclosure of relay communications and the consequences of not following all confidentiality requirements. CAs/operators are taught using various scenarios which demonstrate the correct way to request assistance from a supervisor without divulging call-specifics. Annually, all TRS call center staff receives re-training which includes items such as confidentiality, ethics, and inclusion and diversity. All CAs/operators annually sign a confidentiality agreement to maintain confidentiality.

Confidentiality is reinforced through our CAs'/operators' participation in an interactive training program focusing on scenarios that they are likely to encounter when relaying calls.

Correct Ways to Protect Confidentiality	Examples of Breaches of Confidentiality
To make a generic comment about calls: "Boy – long calls really wear me out."	Talking about the specific length of a call. For example, saying to another agent, "You know that call I took over for you? It lasted 84 minutes!"
To share general observations about calls: Example, "I'm noticing a lot of HCO calls lately."	Talking about specific callers. Example, "I relayed a call for Miss Deaf America." Or "I had that VCO user from Florida again this morning."
It is appropriate to respond to a customer's comments with a brief "thank you" or something to that effect without	The agent should never say to a customer: "I remember you from a previous call – how are you doing?" Phone lines do not talk to voice telephone users; it is the same with relay customers.

Correct Ways to Protect Confidentiality	Examples of Breaches of Confidentiality
elaboration. Maintain a professional and friendly image	
with customers.	
It is appropriate to discuss with a member of management	It is not appropriate to discuss call content or conversations with
technical or procedural components of a call. For	others, ever.
example, to say you had problems placing a calling card	
call from a pay phone.	
It is appropriate to call for a Supervisor to look at your	It is not appropriate to request assistance from the agent sitting
screen for assistance with the call.	next to you.

All relay center personnel are required to sign and abide by the Sprint Relay policy for confidentiality. These confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. The relay center Code of Ethics requires the following:

- Keep all TRS call-related information strictly confidential.
- Keep no records of customer information or content of any TRS call.
- Refrain from editing or omitting anything from the content of the conversation or the spirit of the speaker.
- Refrain from adding or injecting into the content of the conversation or the spirit of the speaker.
- Assure maximum customer control.
- Strive to further skills and knowledge through training, workshops, and reading literature available in the field.

In accordance with the FCC, all information utilized for call set up, including customer database and preferred call type information remains confidential and cannot be used for anything but the call. Once the inbound party disconnects, all information pertaining to that call disappears from the CA's/operator's terminal. The required confidentiality and security of the customer preference data is covered during training of all employees and reinforced throughout employment. Sprint takes the following steps to ensure Customer Profile information remains secure:

- Sprint does not modify a customer's record based on experience.
- All Customer Profile database entries contain time and date stamps and note the identification number of the CA/operator who processed the request.
- Relay users register a username and password/PIN. Sprint also asks customers to register
 a security question and answer only known to them in case the username and password is
 lost or forgotten.
- Sprint's Customer Profile information is encrypted and protected from outside access by firewalls.

CTI Confidentiality Form

Consumers need to be confident that their personal and professional calls are kept in the strictest confidence. It is crucial that all employees understand and abide by this Confidentiality Policy.

All information obtained during a CapTel call is to be kept strictly confidential. The only person(s) to whom information obtained during a call may be divulged is a member of the administrative team (i.e. supervisors, trainers, HR representatives, the Floor Operations Coordinator, or the Call Center Director). Only specific, pertinent information relating to Training, Call difficulty, Technical difficulties, Emergencies or Customer service issues may be disclosed to the appropriate personnel, and this must be done in private.

Under no circumstance are identifiers to be used while discussing a call (terminology that would identify personal information about a caller including, but not limited to, gender, name, address, and business information). The standard, objective way off referring to callers is to identify the person using the captioned telephone as the "client," while the other party or parties are referred to as the "doc(s)." Furthermore, any person not employed by CapTel, Inc. or its parent company shall not be allowed on or near the call floor.

Nor shall information regarding CapTel clients be discussed or posted in any public forum. Employees agree to abide by the following:

- I shall only discuss the content of a CapTel call (production, training, timing, or otherwise) with a member of the administrative team under the guidelines provided above. I will not discuss the content of a CapTel call with other persons (CAs, friends, family members, etc.).
- I shall disclose only appropriate information regarding a training/timing call to a member of the administrative team according to the guidelines documented above.
- I shall not divulge specific information related to the work or calls I have heretofore processed, upon termination of my employment at CapTel or at any time thereafter.
- I shall not disclose information which could be used to identify specifics about a particular consumer to anyone except a member of the administrative team according to the guidelines documented above.
- I shall not act upon any information received via a CapTel call.
- I shall not listen to, get involved in, or position myself to observe a CapTel call being processed by another employee.
- I shall not disclose information which could be used to identify specifics about any employee
 including, but not limited to, name, CA number, and schedule, except as is necessary to
 appropriate individuals and/or institutions or services.
- I shall not divulge my personal CA number in conjunction with my name except as required by a member of the administrative team.
- I shall not disclose the technical aspects of my position to anyone not employed by CapTel/Ultratec.
- I shall not bring visitors, including children, onto the call floor.
- I shall remain off of the call floor if I am not scheduled to be at work.

Employee Name (please print)	
Employee Signature and Date	

Sprint Confidentiality Form

IN CONSIDERATION of: (1) my employment with Sprint or any subsidiary, affiliate, or successor-in-interest of Sprint Corporation, (2) my continued employment as long as mutually agreeable, and (3) the opportunity to receive Sprint confidential customer information or other good and valuable consideration:

AS AN EMPLOYEE OF THE RELAY SERVICES ORGANIZATION, I UNDERSTAND THAT I AM BOUND BY ALL SPRINT POLICIES AND SPECIFICALLY, I AGREE AS FOLLOWS:

- 1 ALL TELECOMMUNICATIONS RELAY SERVICE (TRS) CALL RELATED INFORMATION SHALL BE KEPT STRICTLY CONFIDENTIAL. I will not reveal any information acquired during or observing a relay call. I will only discuss call-related questions or problems with management or Human Resources. I agree to keep confidential all information I learn in my position for the duration of and after my employment with Sprint ends.
- 2 NO RECORDS OF CUSTOMER INFORMATION OR CONTENT OF ANY TRS CALL SHALL BE KEPT BEYOND THE DURATION OF THE CALL, WITH LIMITED EXCEPTIONS FOR AUTHORIZED COMPANY PROCEDURES. I will not keep a record of any customer information or conversation content beyond the duration of the call except in accordance with company procedures for relaying Speech to Speech calls or for billing and customer profile purposes. I will destroy all such records in my possession immediately upon completion of their authorized use.
- 3 NOTHING MAY BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. I will transmit exactly what is said in the way that it is intended in the language of the customer's choice.
- 4 NOTHING MAY BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. I will not advise, counsel, or interject personal opinions, even when asked to do so by the customer.
- 5 TO ASSURE MAXIMUM CUSTOMER CONTROL, I WILL BE FLEXIBLE IN ADAPTING TO THE CUSTOMER'S NEEDS.
- 6 I WILL STRIVE TO FURTHER MY SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.
- 7 ALL SPRINT MATERIALS IN MY POSSESSION PERTAINING TO ANY SPRINT CUSTOMER WILL BE DELIVERED UPON THE TERMINATION OF MY EMPLOYMENT.

I have read and understand the Sprint Relay Center Agreement Regarding Confidential Customer Information. I agree to comply and understand that failure to do so will lead to company disciplinary action

that may result in my termination and/or criminal prosecution. I also understand that ascertaining damages resulting from a breach of this agreement would be difficult. I agree that Sprint shall have the right to an injunction against me, enjoining any such breach without any obligation to post bond. I agree that this will be in addition to and without limiting any other remedies or rights Sprint may have against me.

EMPLOYEE SIGNATURE AND DATE

MANAGER/SUPERVISOR SIGNATURE AND DATE

Sprint Federal Confidentiality Form

The Federal Relay provides a transparent link of telecommunication between typed/signed/voice (disabled) and voiced (non-disabled) messages. As part of the relay services organization all employees and subcontractors are bound to the following rules and regulations:

- All Federal Relay call related information is to be strictly confidential.
- Nothing is to be edited or omitted from the content of the conversation or the spirit of the Federal Relay user.
- Nothing is to be added or interjected into the content of the conversation or the spirit of the Federal Relay user.
- To assure maximum user control, the employee will be flexible in adapting to the caller's needs.
- Employees and subcontractors will strive to further competency in skill and knowledge through continued training, workshops and reading of current literature in the field.

~ Employee and Subcontractor Role ~

- 1) The employee or subcontractor shall not disclose the content of any relayed conversation with the exception of resolving issues with supervisors regarding customer complaints.
- 2) The employee or subcontractor is prohibited from identifying the name of any caller. The employee or subcontractor shall not reveal or act upon any information obtained from the caller while relaying calls, except to resolve issues regarding complaints that are handled through the supervisors.
- 3) The employee or subcontractor shall not discuss the specifics of any call relayed (even for training purposes) with coworkers, counselors, or other support services. Nor shall specifics be discussed with supervisors except to resolve issues regarding complaints.
- 4) Any Federal Tax Return information [as defined in Internal Revenue Code (IRC) 6103 (b)(1),(b)(2)] made available shall be used only for the purpose of carrying out the provisions of the Federal Relay contract. Information contained in such material shall be treated as confidential and shall not be divulged or made known in any manner to any person except as may be necessary in the performance of this contract. Disclosure to anyone other than an authorized employee or subcontractor of Sprint shall require prior written approval of the Internal Revenue Service (IRS). Requests to make such disclosures should be addressed to the GSA Contracting Officer.
- 5) Return information disclosed to an employee or subcontractor can be used only for a purpose and to the extent authorized within the Federal relay contract, and further disclosure or any inspection of such return information for a purpose of to an extent unauthorized herein respectively constitutes a felony or criminal misdemeanor punishable upon conviction by a fine as much as \$5,000.00 or imprisonment for as long as 5 years, or both together with the costs of prosecution. These penalties are pursuant to IRC 7213, 7213A, 7431, and 26 CFR Section 301.6103(n)-1.
- 6) Any such unauthorized future disclosure of returns or return information may also result in an award of civil damages against the employee or subcontractor in an amount not less than \$1,000.00 with respect to each instance of unauthorized disclosure. These penalties are prescribed by IRC sections 7213 and 7413 and set forth at 26 CFR Section 301.6103(n)-1.
- 7) Employees and subcontractors have been notified of the penalties for improper disclosure imposed by the Privacy Act of 1974, U.S.C 552a. specifically, 5 U.S. C. 552a(I)(1), which is made applicable to subcontractors by 5 U.S.C. 552a(m)(1), provides that any employee of a subcontractor who by virtue of his/her employment or official position, has possession of or access to agency records which contain individually identifiable information, the disclosure of which is prohibited by the Privacy Act or regulations established there under, and who knowing that disclosure of the specific material is so prohibited, willfully discloses the material in any manner to any person or agency not entitled to receive it, shall be guilty of a misdemeanor and fined not more than \$5,000.00.
- 8) Employees and subcontractors shall be responsible for the confidentiality of all calls relayed consistent with Federal Laws, Statutes, and Regulations.

- 9) Employees and subcontractors shall ensure that no records are maintained of any conversation, in accordance with the Privacy Act of 1974 (P.L 93-579), IRC 6103, 6103(n), 26 CFR Section 301.6103 (n)-1, the Internal Revenue Service Acquisition Procedures (IRSAP) and Office of Management and Budget (OMB) guidance on the Privacy Act of 1974 (Federal Register, Volume 52, No. 75, Page 12990).
- 10) This Pledge of Confidentiality will remain in the employee's and subcontractor's file until termination of employment and shall be made available to an authorized representative for the General Services Administration (GSA) as may be requested.

I have read and fully understand the Federal Relay Code of Ethical Behavior. I agree that failure to do so will lead to disciplinary action that may include termination. I agree to process calls in the manner required by the Federal Government as detailed in the Federal Relay contract. I agree to abide by this Code of Ethics even after my employment with Sprint and/or subcontractor ends.

Employee/Subcontracto	Employee/Subcontractor Signature Date				
Supervisor Signature	Date				
Company Name (Print o	or Type)				
	,				

Note: All of Sprint's Employees and subcontractors working on this contract will be acquainted with the applicable portions of FIRMR, the Privacy Act of 1974, and the Freedom of Information Act, and implementing regulations and policies. The employees and subcontractors will also be given copies of the following criminal and civil disclosure and inspection penalties, in full text, IRC 7213, IRC 7213A, and IRC 7431.

Appendix D: Disaster Recovery

Sprint offers emergency options and uninterruptible power that exceeds the State's minimum requirements by offering an end-to-end approach that is unmatched in the relay industry. Sprint has emergency operations and uninterruptible power systems (UPS) supporting relay call centers, the TRS switches (located at wireline switch sites). Sprint knows a large-scale loss of commercial power is one of the most critical factors impacting access to communication. We have proven programs to keep that from impacting relay services. Both TRS and CapTel offer uninterruptible power supplies and generators to ensure relay users will continue to have access to the service in the event of power outages.

Call Center Power Solutions

Sprint provides a cost effective solution with a UPS using a combination of standard battery backup and an auxiliary generator to provide uninterrupted power for an unlimited duration for key components.

- The switch peripherals
- Switch room environment, including:
- Air conditioning, if required to maintain service
- Fire suppression systems
- Emergency lights and system alarms
- CA consoles/ terminals
- CA work site emergency lights
- Call Detail Recording (CDR)

Sprint ensures the UPS system capacity is sufficient to operate the call center during busy season and busy hour load. Sprint has installed power-generating equipment capable of operating call centers for extended periods. In the event of a power outage, the UPS and back-up power generator ensure seamless power transition until normal power is restored. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. Backup power generators are supplied with sufficient fuel to maintain operations for at least 24 hours. Generators can stay in service for longer periods of time as long as fuel is supplied. As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental controls until commercial power is restored.

Emergency Procedures Training

All Sprint Relay employees are trained on emergency procedures to minimize or prevent disruption to relay users. Sprint instructs its staff on the procedures to be followed in the event of an emergency or service impacting issue. Sprint provides annual training to ensure familiarity with systems and processes. Ad-hoc training is conducted for new procedures or team members.

Sprint's response organizations use exercises to evaluate plans, educate personnel, test functions, and operational capability. Information related to these exercises is propriety to Sprint. Additionally, as part of the nation's critical infrastructure, Sprint participates in coordinated situation drills with Federal Emergency Management Agency (FEMA), the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster.

 Tabletop Exercises: In a round-table setting, members of the response team meet to discuss responsibilities and describe how to react as a team in an emergency.

- Walk-Through Drills: Both the response team and management perform their emergency functions within the emergency response location.
- Functional Drills: Tests designed to target specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness. Often, these functions are tested separately to help identify improvement areas and to eliminate confusion.
- Full-scale Exercises: Exercises simulated to be as close as possible to a real-life disaster.
 They may involve a combination of response teams, management, field operations, and outside agencies.
- After Action Reviews (AARs): Following an incident or an exercise, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as Lessons Learned and tracked to satisfactory completion.
- Maturity: Sprint uses an internally developed Maturity Model for benchmarking the Business Continuity Program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

Business Continuity

Industry accepted principles are the basis for Sprint's BC program. Sprint has adopted key principles from standards set by organizations such as the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, FEMA, Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, International Organization for Standardization (ISO) 27001 and ISO 22301, and several Military Specifications (Mil-Spec) standards. Sprint's Business Continuity Program Overview is reviewed and approved on an annual basis.

Sprint Relay network has a Business Continuity (BC) plan to deal with all types of natural and manmade problems which may prevent calls from reaching the relay center or impact the operation of the TRS platform. The plan identifies how Sprint minimizes impact to relay users and restores relay services. Sprint brings more value when it comes to maintaining operations during natural and manmade events. Sprint's BC methodology and implementation standards are consistent with industry-wide best practices and trusted by experts in the field. The Sprint dedicated BC Teams (BCTs) participate in government-provided and private sector training, and maintain certifications from:

- DRII
- International Association of Emergency Managers (IAEM)
- DHS
- Business Continuity Institute (BCI)

Sprint understands the BC challenges faced by government organizations and has designed state relay services accordingly. Sprint has experience in serving more than 160 federal entities and more than 150 military bases worldwide including the Department of Defense (DOD), State/Local Governments, Law Enforcement, and DHS.

Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery teams to establish customer prioritization once the backbone, Telecommunications Service Priority (TSP) and Critical Life Circuits are re-established.

All departments within Sprint, including the Sprint Relay program, follow these well-established programs to ensure top-notch support for our customers.

Call Center Evacuation Events

Sprint has plans in place to deal with call center events such as fires. Each call center has a designated Safety Marshal and clear chain of command. As a first step, the situation is identified and the threat is assessed. If evacuation is necessary, the local authorities (e.g., 911) are immediately alerted along with the Call Center Service Assurance Center (CCSA) and the Traffic Management Control Center (TMCC). Call center management and Sprint Corporate Security are also alerted.

Traffic will be re-routed immediately to other call centers not impacted and work with those call centers to increase staffing, as needed. Once the issue is resolved, all communication assistants (CAs)/operators return to the center and the incident is fully documented.

Proactive Measures

Over the past 26 years, Sprint Relay users have rarely experienced any type of inability to place calls. Sprint's backup capabilities are unmatched in the TRS industry with 6 call centers (including the location at Sprint headquarters in Overland Park, KS) capable of handling TRS calls and multiple switch locations supporting the TRS platform.

Sprint's switches and call centers are staffed with spare positions and platform components to deal with all types of technical issues. The TRS platform offers automated alarming to notify personnel of issues.

Redundancy is built into our infrastructure to deliver outstanding performance for all of our TRS customers. These attributes will ensure functional equivalency for state relay service callers during disasters. The benefits of our leading-edge platform and flexible configuration include:

- Switches, call controllers, and databases are housed in geographically-dispersed locations that conform to "critical" grade physical security requirements. Sprint's switches and peripherals are located at switch sites in telecom bunkers.
- Redundant connections between switch sites, 800 network, and call centers
- If the problem is within Sprint's TRS center, maintenance can usually be performed from Sprint's centralized center, the CCSA.
- Sprint retains hardware spares at each center to allow for the most common type of repair required without the ordering of additional equipment (except for complete loss of a building).
- Centralized routing and reporting systems enables Sprint to treat the entire call center complex as a single virtual call center rather than standalone call centers
- All TRS positions are capable of handling calls for any State customer.
- All training seats are configured and immediately ready to take production traffic.
- Sprint has pre-established plans for all types of outages.
- Sprint automatic routes calls away from a center undergoing a service recovery event. For example, if a fire drill forces CAs/operators to evacuate, the call router automatically sends calls to other relay centers.

Sprint has historically been the best at dealing with natural and man-made disasters that have caused outages. With each incident Sprint has managed to be prepared, respond and ensure ongoing service delivery. Sprint's processes as detailed here take into consideration every aspect of an outage and/or natural disaster that includes a higher call volume likelihood due to the natural disaster. Some examples of disasters that affected Sprint facilities in the past are:

Wind burst that blew off a portion of the roof of our Syracuse, NY call center

- Farmer cuts Fiber Optic cable servicing Lubbock, TX when burying a cow
- Hurricanes that impacted call centers in Miami and Jacksonville
- Tornado warnings impacting upper Midwest call centers. One evening, 37 Tornadoes were within range of our call center. Our center had to be evacuated. Sprint continued to provide service without interruption.

These list just a few of the natural and man-made disasters we faced, and with each one we were able to maintain our service levels with the processes we have in place. Our employees are the best at ensuring we maintain these service levels.

TRS Data Center Disaster Planning

Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at all of our switch locations. These main switch locations currently have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster recovery issues. Most switches also have tap boxes to readily connect the output of a portable generator in the event of primary generator issues.

TRS Winter Preparedness Plan

Sprint has processes in place if a known weather event is encountered. These known contingency plans are designed to mitigate our customers' degradation of service and are maintained by the TMCC. Each service has back-up locations to ensure redundancy.

Known Event

- Four days prior TMCC and Ron Peay (Operations Manager) will make a determination as to the severity and number of centers which might be affected.
- Three days prior TMCC and Ron will verify previous day's potential impact and begin calling to non-effected centers to post overtime (OT). All centers will be advised to put a list together of employees who will work overnight and weekends. TMCC will notify John Moore (Manager Customer Relations) and CCSA of our "game plan"
- Two days prior TMCC will meet with Ron to update impacts and plan. All non-impacted centers will be called to update OT requirements and overnight requests.
- One day prior TMCC will meet with Ron to update impacts and plan.
- Day of Event TMCC will invoke emergency call routing as required. TMCC will be the point of contact for all notifications. Affected centers will update TMCC every four hours. TMCC will update Ron who will update Business Continuity Manager through executive level. Management is also responsible for notifying the Business Continuity Team.

Unknown Event

The Activation Criteria Plan will be used when either weather or other events cause potential significant (excess of 25 percent) increase in call volumes or one or more TRS call centers is off-line for more than two hours, using the following procedure:

- Automated alarming and/or TRS call center notifies TMCC
- TMCC contact CCSA
- CCSA sends notification to a pre-established distribution list
- CCSA establishes a conference call to work on resolving the issue with impacted groups

After fix agencies are unable to re-establish center operations – the Business Continuity Plan (BCP) is invoked and Management will notify the Business Continuity Management Team.

CapTel-Specific Disaster Recovery Information

CapTel, Inc. (CTI) and Sprint have worked together to develop a complete plan for dealing with all types of natural and man-made problems including but not limited to terrorism and phone line cut accidents. Performance at the CapTel call center is monitored continuously by CTI technicians 24/7. Sprint will be notified by the CapTel Service Center Manager immediately upon determination of any type of natural or man-made problem that causes disruption either:

CapTel has established contingency plans in the event of a complete and extended loss of a CapTel call center. The plan includes a number of steps based on the estimated duration of the outage and takes advantage of the relative short travel time between the Wisconsin CapTel call centers. The first phase is organized to initiate the recovery process within hours and can be fully completed within days. This involves expanding service into available space in the operating call center locations and other CapTel facilities

- All training seats are configured and immediately ready to take production traffic.
- Additional production seats are established in unused and available space within the existing facilities.
- Regular shuttle services are established to transport qualified CapTel CAs/operators and staff from the outage area to and from the expanded facilities.

The recovery plan includes a second phase for extended outages. To support this longer duration, CapTel has identified additional disaster recovery locations with appropriate facilities in the metropolitan area of each of the call centers.

The addition of the Orlando, FL and Sprint's TRS/CapTel call centers has alleviated many of the inclement weather challenges presented by the winter season. However, if inclement weather affects the CapTel staffs' ability to arrive to work, in most cases, with minor adjustments, CTI can still meet the call volume demand with enough staff coverage in a wide range of snow fall amounts. However, if necessary, Sprint and CTI will institute proven tactics, as necessary, to motivate, encourage, and enable CapTel CAs/operators to be present or to pick up additional hours so CTI can meet its service level requirements during inclement weather

Customer Notification Procedures

Sprint will inform the state contract manager of any major interruptions to the TRS/CapTel service that exceeds five minutes in duration or isolates part of the state. To provide the contract manager with the most complete and timely information on problems affecting relay service, Sprint's trouble reporting procedure for TRS and CapTel includes multiple levels of response:

- Immediate notification of events that last 5 minutes or isolate part of the State
- Notification when the issue is resolved and/or status updates (every 24 hours)
- Comprehensive final report within 3 days

Within 24 hours of the Relay service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals the problem has been corrected and full relay service has been restored. The state contract manger (or designate) will receive this notification from your Sprint Customer Relationship Manager (CRM). He/she and/or a member of the management team will provide the final report and follow up on steps Sprint will take to ensure we can minimize the likelihood of this event occurring again.

Final reports include a comprehensive look at the event, including the following:

How the problem occurred

- When the problem occurred
- The number of impacted customers (if known)
- What was required to correct the problem
- Time and date the relay service resumed full operation
- Avoidance plan for future (if applicable)

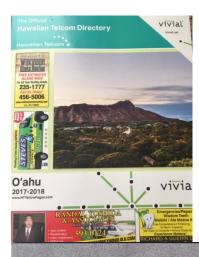
Temporary Delay Message

If approved by the state, Sprint can also provide a temporary delay message for TRS users that is turned on only when long hold times may occur as a result of weather or other event impacting service. For example, if there were a terrorist attack or natural disaster that significantly increased the number of calls to the relay center, Sprint can add a temporary recording that alerts voice and TTY users, such as: "THE RELAY CENTER IS EXPERIENCING LONGER THAN NORMAL HOLD TIMES. PLEASE HOLD FOR THE NEXT AVAILABLE CA OR TRY YOUR CALL AGAIN LATER."

Telecommunications Service Priority (TSP)

All of Sprint's circuits supporting TRS and CapTel services have qualified for priority restoration under the TSP program. Sprint's participation in the TSP Program strengthens our robust reliability. If a national or regional emergency causes service to be disrupted and the call center cannot receive or place calls, Sprint's participation in the TSP program means Local Exchange Carriers (LECs) would be required to restore service as rapidly as possible consistent with the priority status assigned. Sprint's reliable network and TSP participation ensures Sprint's disaster recovery ability is unmatched by any Relay provider in the world.

Appendix E: Hawaii TRS Information in Telephone Directories



12

General Information

CALLING ASSISTANCE COR PEOPLE WITH HEADING OR SPEECH DISABILITIES

The Americans with Disabilities Act of 1990 requires all states to provide access to a nationwide Telecommunications Relay Service.

Telecommunications Relay Service (TRS). Through TRS, callers using Text Telephones (TTY/TDD) are able to communicate with people who use standard voice telephones and vice versa. A specially trained Communications Assistant (CA) relays telephone conversations verbatim. The CA translates typed words into speech and spoken words into typed messages so that TTY users and voice telephone users can converse. The CA relays the entire conversation, leaving nothing out. Calls made through the relay service are entirely confidential. TRS operates 24 hours a day, seven days a week.

To use TRS, (both TTY and non-TTY users, as well as Speech-to-Speech users) simply dial 7-1-1.

Note: For emergency calls, users should dial 9-1-1.

How to Make a TRS Call

from a Coin Telephone

Some public pay phones are specially equipped to provide service to persons with speech and hearing disabilities. You can make a TRS call from a coin phone that has a built-in TTY. Local calls can be made at no charge but for long distance calls, you must use a calling card, prepaid card or make the calls collect or third-number billing.

WHEN USING A COIN PHONE WITH A BUILT IN QWERTY KEYBOARD

TO PLACE A LOCAL TTY CALL:

Step 1: Lift the phone receiver

Step 2: Dial ***

Step 3: Dial 7-1-1 or the TTY direct telephone number

Step 4: When the screen says "call answered:" dial ***
Step 5: Wait for the display screen to say "<TYPE MESSAGE
HERE>," then type your message using the keyboard

Step 6: When you have completed your call, hang up the phone receiver

To SEND AN SMS (TEXT) Message: Step 1: Lift the phone receiver

Step 2: Dial ** 01

Step 3: When prompted, enter the destination number (10 digit number of the device you want to send the message to)

Step 4: When you have entered the destination number, enter *9 to move the next screen

Step 5: Enter your message, when complete, send your message using "9

Step 6: When you have completed your call, hang up the phone receiver

WHEN USING A COIN PHONE WITH A SLIDE OUT KEY-BOARD DRAWER

TO PLACE A LOCAL TTY CALL:

Step 1: Lift the handset and place it in the holder on the side of the phone

Step 2: Dial 7-1-1 or the TTY direct felephone number Step 3: LED (Red Light) Line Status: Slow flashing – line ringing/Fast flashing – line busy

Step 4: If a TY machine or the CA answers the call, the TY drawer will open automatically, You may begin typing Step 5: If the call is answered by a hearing person, press *** to start the TY announcer

Step 6: If the drawer begins to close before you complete your call, press any button on the keypad to reopen it Step 7: When you have completed your call, hang up the phone. The drawer will close automatically

CALLS THAT MUST GO THROUGH A TRS COMMUNICATIONS ASSISTANT:

- COLLECT CALLS
- CALLING CARD CALLS
- BILL TO THIRD NUMBER CALLS

IAWAIIAN TELCOM INFORMATION

Appendix F: Copies of Hawaii Telephone Bill Inserts

Always	On.				Hawaiian Te	elcom
		Account No. Billing Telephone No. Invoice No.	76553228	Invoice Date Service Perio Payment Due	od 08/22/17 - 09/21/17	
BALANCE FORWAR	D		100			\$0.00
PREVIOUS BALANCE PAYMENTS RECEIVED Check Paym		ank you	100000000000000000000000000000000000000	08/07/17	\$42.85 CR	\$42.85 \$42.85 CR
MONTHLY BUNDLE		an you		00/07/17		\$48.95
Free Long D	Distance Calling to anywh	iere in the US				
						\$12.26 CF
MONTHLY ADDITION Service Del	NAL CHARGES & DIS			Service Period	Charge	\$12.26 CF
MONTHLY ADDITION Service Del	NAL CHARGES & DIS		30	Service Period /22/17 - 09/21/17	Charge \$5.81 CR	\$12.26 CF
Service Del Home Phor Go Local Ple Long Dista	tail ne - (\$12.26 CF
Service Del Home Phor Go Local Pli Long Dista Call More D	NAL CHARGES & DIS	COUNTS		/22/17 - 09/21/17	\$5.81 CR	\$12.26 CF
MONTHLY ADDITION Service Del Home Phor Go Local Pl Long Dista Call More D FAXES/SURCHARGE Access Rec Federal Exc	IAL CHARGES & DIS tail ne - (COUNTS		/22/17 - 09/21/17	\$5.81 CR	
Home Phor Go Local Ple Long Dista Call More D FAXES/SURCHARGE Access Rec Federal Exc Federal Uni Federal Uni General Exc	IAL CHARGES & DIS tail Ine - (EES		/22/17 - 09/21/17	\$5.81 CR \$6.45 CR \$0.47 \$0.35 \$1.39 \$1.24 \$0.38 \$0.22	
MONTHLY ADDITION Service Del Home Phor Go Local Pl Long Dista Call More D FAXES/SURCHARGE Access Rec Federal Exc Federal Uni Federal Uni General Exc General Exc Intrastate Si	IAL CHARGES & DIS tail Ine - {	EES		/22/17 - 09/21/17	\$5.81 CR \$6.45 CR \$0.47 \$0.35 \$1.39 \$1.24 \$0.38	

Appendix G: Hawaii FCC Complaint Logs from 2013-2017

Complaint Tracking for HI (06/01/2013-05/31/2014). Total Customer Contacts: 1

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	10/21/13	The complaint said that the Operator did not keep him informed of what was happening during the call; there were too many long delays. Customer requested follow up. Apologized and informed customer his feedback will be sent to the call center where the Operator is located.	10/23/13	The Operator was met with and reminded of the importance of keeping the caller informed as to the nature of the delay.

Complaint Tracking for HI (06/01/2014-05/31/2015). Total Customer Contacts: 2

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	02/18/15	Customer reported misspelled words and garbied captions on the CapTel 840.	03/02/15	Customer Service Representative apologized for the incident and thanked the customer for the feedback. Call detail was shared with Call Center management for follow up with the Operator by the Operator's supervisor. Operator's supervisor increased monitoring frequency for the Operator to ensure consistent quality performance. Customer Service Representative emailed the customer to inform them of the steps taken.
2	03/17/15	Hearing customer states that she wanted to perform a test using the relay service to call her company's 800 number to make sure their deaf and hard of hearing customers would be able to get through. This operator was not able to place a voice to voice call but was very rude, curt and not at all professional in letting the customer know this. The caller said that they did not feel that the operator even listened to what was being said, but just stated that they could not place the call and cut them off. Relay Customer Service response: apologized for the problem and assured that the complaint would be sent in as stated. Also explained how to do the test call a different way using their company TTY.	03/17/15	Supervisor spoke with the Operator. Operator stated he didn't think he spoke in a rude manner when he explained to voice customer that he was not able to process a voice to voice call. Operator apologized for the inflection in voice if it had come out in a non-professional manner.

Complaint Tracking for Hawaii (06/01/2015-05/31/2016). Total Customer Contacts: 1

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	09/01/15	Customer Complaint: The customer called to report that when he dials to 711 for Hawaii Relay he instead is connected to Sprint Relay Customer Service. This began happening last week. Customer Service Response: The weekend customer service representative forwarded the information to our department for resolution. In the meantime, the customer also contacted the Program Manager. The Program Manager forwarded the email from the customer to Customer Service for follow up. A trouble ticket has been entered to correct the 711 translation issue. Follow up is requested from the Program Manager.		The customer and Program Manager communicated by emails. The Program Manager checked with the Call Center Manager and Sprint Relay Customer Service for further information. The customer is used to having the same telephone provider but did not realize that he switched to a different provider. The Program Manager gave him the instructions on how to reach the provider about correcting the routing for the Hawaii Relay number. The technician visited his place and fixed the problem. The customer thanked the Program Manager for the assistance.

Complaint Tracking for Hawaii (06/01/2016-05/31/2017). Total Customer Contacts: 2

Tally	Date of Complaint	Nature of Complaint	Date of Resolution	Explanation of Resolution
1	02/10/17	Voice Carry Over user stated that the Operator needs more training in processing Answering Machine Retrieval. Operator was unable to retrieve messages at all. Voice Carry Over user request follow up call.	02/10/17	Supervisor coached the Operator on the correct answering machine retrieval procedure reminding the Operator to make sure the line has been switched to the data line so the caller will receive the typed messages. Multiple attempts were made to follow up with the customer, as per requested, resulting in a message being left on the answering machine.
2	03/15/17	TTY user stated that they felt this Operator was rude and aggressive and even typed "I get paid if I work or not". Assistant Supervisor documenting the concern apologized for the inconvenience. Caller has requested a follow up from the program manager but did not provide any follow up information.	03/15/17	Supervisor coached the Operator to not get involved with the call and to request supervisor assistance for further instructions.

Appendix H: Relay Brochures and Other Advertisements







STS and HCO Banner stand

Relay Hawaii Homepage



Hawaii CapTel Homepage



NEWS FLASH

International Calling with CapTel

Effective January 4, 2017, all CapTel phone users can place and receive International calls ONLY IF the CapTel phone is located within the United States or one of the US Territories.

- All Internet-based CapTel phone users are responsible for their own long distance or international calling charges.
- CapTel users cannot take their CapTel phone outside of the country (or US Territory) and make a captioned call. It will not work.

NOTE: International dialing capabilities do not include the Sprint WebCapTel service. Only CapTel phones.

As Seen On TV



For CapTel support, click Live Chat below:



Click below for more information:





Hawaii Captioned Telephone Service is a free service provided by the State of Hawai'i Public Utilities Commission (PUC), ensuring equal communication access to telephone service for people with hearing loss. Copyright © 2017 Hawaii Capital, All Rights Reserved, Capital and WebCapital are registered trademarks of Utiratec, Inc.

Hawaii Relay Conference Captioning Homepage



Relay Conference Captioning

Skip to main content

Enter Your Event ID

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How to schedule a call Book an event now

About RCC

Ordering transcripts View the Demo

Contact Us

Help/FAQ Hours of Operation

Tips for using RCC mobileRCC

Web Conferencing

You're one click away from using Relay Conference Captioning (RCC)

Now, Deaf and Hard-of-Hearing individuals can participate in meetings, phone calls, videoconferences and multi-party teleconference calls with Relay Conference Captioning (RCC) through Relay Hawaii provided by Sprint.

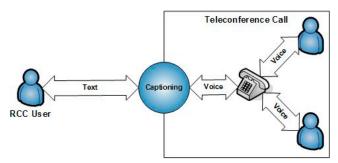
Using the same high-quality captioners that produce closed captioning for television, you can receive live, realtime text streamed to an Internet-connected computer anywhere in the world. A high-speed Internet connection is required.

How does it work?



The benefits of RCC

- · The service is available to all Hawaii residents
- May reserve your live captioner in advance
- · Can be used at any computer with Internet access
- Receive captioning more quickly and efficiently for multi-party communications
- Can receive a text transcript of the conversation for your records

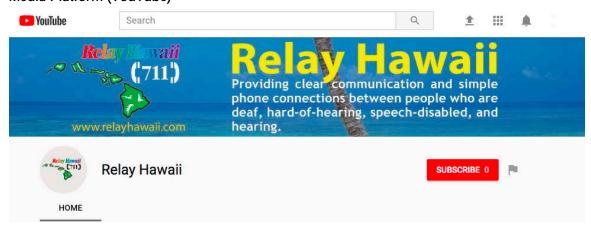




Relay Hawaii RCC is provided by Sprint, as regulated by the Hawaii PUC.



Media Platform (YouTube)



Uploads PLAY ALL



Relay Hawaii Connecting All



Relay Hawaii Video Assisted Speech to Speech (VA-STS)



Relay Hawaii for Spanish-Speaking Callers



SprintCapTel Spanish V2 CapTel Only VO with840i

6 views + 2 weeks ago 3 views • 1 month ago

23 views • 1 year ago

18 views • 1 year ago



Hawaii CapTel - 2015 83 views • 1 year ago



Hawaii Relay Conference Captioning (RCC) for Deaf

74 views • 3 years ago



Hawaii Relay Conference Captioning (RCC) for Hard-of-

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Relay Hawaii Hearing Carry-Over (HCO)

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Relay Hawaii TTY 82 views • 3 years ago



Relay Hawaii Voice Carry-Over (VCO)

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Relay Hawaii for Spanish-Speaking Callers

38 views • 3 years ago



Relay Hawaii Speech-to-Speech (STS)

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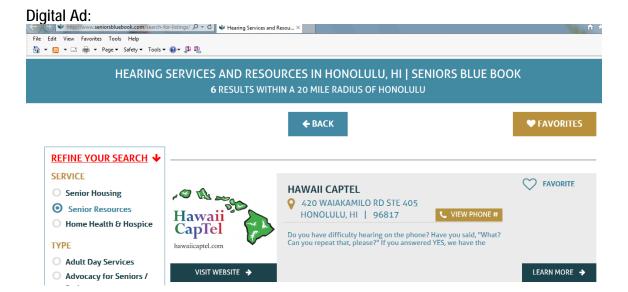
Hawaii CapTel - As Seen On TV

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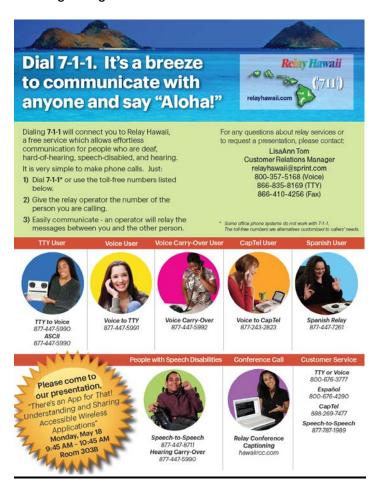


Hawaii CapTel - As Seen On

11 views • 2 weeks ago



Full Page Program Book Ad:









Special Sales Event!

Sprint Says Thanks to the Deaf and Hard of Hearing Community!

ONE DAY ONLY!

Saturday, May 27, 2017 • 9:00 AM - 5:00 PM

Sprint Store – Ala Moana #1620 660 Ala Moana Blvd, Suite 100 Honolulu, HI 96813 808-524-4545



Buy a new device or get an upgrade?

- Sprint Relay Data Only Plan (SRDOP)
- Switch to Sprint:
 Unlimited \$30 month/line for 4 lines
 Savray smill \$30/lbb. then \$50/lma for line 1, \$40/lma, for line 3, 6 \$30/lma, for
 line 3, 4 houces underted tail, tell 4, date, 45 video stream at up to 1000/lma
 during congested. Mels. (Per and VIV) educated to 20 seeds after 100/lmb.
 Pricing shown with \$5/lma, fire AutoRyd discount applied wijn 2 line. Other modranges apply.

Communication Access? Yes!

- · ASL interpreters will be on-site.
- We will be available to help you!

For more information: go to www.sprintrelaystore.com or contact: LisaAnn Tom, Customer Relations Manager at relayhawali@eprint.com or 808-447-3027 (VP) Kenneth Goulston, Sprint Accessibility Manager at 868-656-3001 (VP)

As proposed to the form of the first of the

PUBLIC UTILITIES COMMISSION

269-16.6

- (e) For the purposes of this section, the term "restoration and repair costs" means those costs necessary to restore facilities damaged by a state-declared emergency to a functional level substantially the same as that existing immediately before the emergency and does not include the costs of upgrades or enhancements.
- (f) Any utility authorized by the public utilities commission to assess a surcharge pursuant to this section shall state separately the amount of the assessment on each affected ratepayer's monthly bill. [L 1993, c 337, §4]
- **§269-16.5** Lifeline telephone rates. (a) The public utilities commission shall implement a program to achieve lifeline telephone rates for residential telephone users.
- (b) "Lifeline telephone rate" means a discounted rate for residential telephone users identified as elders with limited income and the handicapped with limited income as designated by the commission.
- (c) The commission shall require every telephone public utility providing local telephone service to file a schedule of rates and charges providing a rate for lifeline telephone subscribers.
- (d) Nothing in this section shall preclude the commission from changing any rate established pursuant to subsection (a) either specifically or pursuant to any general restructuring of all telephone rates, charges, and classifications. [L 1986, c 116, §3; am L 1990, c 67, §8]
- **§269-16.6** Relay services for the deaf, hearing-impaired, and speechimpaired. (a) The public utilities commission shall implement a program to achieve relay services for the deaf and hearing-impaired not later than July 1, 1989, and the speech-impaired not later than July 1, 1992.
- (b) "Relay services for the deaf, hearing-impaired, and speech-impaired" means a twenty-four-hour operator-assisted telephone relay service staffed by persons who are able to receive and transmit phone calls between deaf, hearing-impaired, and speech-impaired and hearing persons using a telecommunication device for the deaf in conjunction with a telephone.
- (c) The commission shall investigate the availability of experienced providers of quality relay services for the deaf, hearing-impaired, and speech-impaired. Contracts for the provision of these relay services to be rendered on or after July 1, 1992, shall be awarded by the commission to the provider or providers which the commission determines to be best qualified to provide these services. In reviewing the qualifications of the provider or providers, the commission shall consider the factors of cost, quality of services, and experience, and such other factors as the commission deems appropriate.
- (d) If the commission determines that the relay service can be provided in a cost-effective manner by a service provider, the commission may require every telephone public utility to contract with that provider for the provision of the relay service under the terms established by the commission.
- (e) Notwithstanding subsections (c) and (d), relay services for the period beginning July 1, 1989, and ending June 30, 1992, shall be provided by every telephone public utility providing local service; provided that the commission and the provider or providers can agree on the terms and conditions for the provision of those relay services.
- (f) The commission shall require every telephone public utility providing local telephone service to file a schedule of rates and charges and every provider of relay service to maintain a separate accounting for the costs of providing for relay services for the deaf, hearing-impaired, and speech-impaired.

107

(g) Nothing in this section shall preclude the commission from changing any rate established pursuant to this section either specifically or pursuant to any general restructuring of all telephone rates, charges, and classifications. [L 1988, c 207, §2; am L 1989, c 295, §2; am L 1991, c 63, §2]

§269-16.7 Telecommunications; expedition of ratemaking procedures. Whenever a public utility providing local exchange telecommunications services applies for approval of rates, charges, or fees in tariffs for specialized services for the deaf, hearing-impaired or speech-impaired, the commission shall expedite to the greatest extent possible any necessary ratemaking procedures. Further, the commission shall be authorized to approve interim surcharges imposed on all subscriber lines, in order to permit the recovery of those actual costs incurred from the time of commencement of the specialized services for the deaf, hearing-impaired and speech-impaired to the time of the next general rate increase. [L 1988, c 207, §3; am L 1991, c 63, §3]

[§269-16.8] Aggregators of telephone service requirements. (a) For the purposes of this section:

"Aggregator" means every person or entity that is not a telecommunications carrier, who, in the ordinary course of its business, makes telephones available and aggregates the calls of the public or transient users of its business, including but not limited to a hotel, motel, hospital, or university, that provides operator-assisted services through access to an operator service provider.

"Operator service" means a service provided by a telecommunications company to assist a customer to complete a telephone call.

- (b) The commission, by rule or order, shall adopt and enforce operating requirements for the provision of operator-assisted services by an aggregator. These requirements shall include, but not be limited to, the following:
 - (1) Posting and display of information in a prominent and conspicuous fashion on or near the telephone equipment owned or controlled by the aggregator which states the identity of the operator service provider, the operator service provider's complaint handling procedures, and means by which the customer may access the various operator service providers.
 - (2) Identification by name of the operator service provider prior to the call connection and, if not posted pursuant to subsection (b)(1), a disclosure of pertinent rates, terms, conditions, and means of access to various operator service providers and the local exchange carriers; provided that the operator service provider shall disclose this information at any time upon request by the customer.
 - (3) Allowing the customer access to any operator service provider operating in the relevant geographic area through the access method chosen by the provider or as deemed appropriate by the commission.
 - (4) Other requirements as deemed reasonable by the commission in the areas of public safety, quality of service, unjust or discriminatory pricing, or other matters in the public interest. [L 1989, c 241, §1]

[§269-16.9] Telecommunications providers and services. (a) Notwithstanding any provision of this chapter to the contrary, the commission may, upon its own motion or upon the application of any person, and upon notice and hearing, exempt a telecommunications provider or a telecommunications service from any or all of the provisions of this chapter upon a determination that the exemption is in the public interest. In determining whether an exemption is in the public interest, the

Appendix I: Award Announcing Sprint Accessibility as Relay Hawaii's TRS Provider

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

---- In the Matter of ----)

PUBLIC UTILITIES COMMISSION

DOCKET NO. 2016-0365

Instituting an Investigation Into the Availability of Experienced Providers of Quality Telecommunications Relay Services, Pursuant to Hawaii Revised Statutes § 269-16.6.

DECISION AND ORDER NO. 34537

2011 MAY -4 A 8: 38
PUBLIC UTILITIES

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF HAWAII

---- In the Matter of ----)

PUBLIC UTILITIES COMMISSION

Instituting an Investigation Into the Availability of Experienced Providers of Quality Telecommunications Relay Services, Pursuant to Hawaii Revised Statutes § 269-16.6. Docket No. 2016-0365

Order No. 3 4 5 3 7

DECISION AND ORDER

By this Decision and Order, the commission adopts the evaluation committee's selection of Sprint as the exclusive provider of intrastate telecommunications relay services ("TRS") in the State of Hawaii ("State") for the service period from July 1, 2017, to June 30, 2020 ("Service Period"). The selection of Sprint as the exclusive provider of TRS for the Service Period is conditioned upon execution of the TRS contract with Sprint,

The Parties to this docket are the DIVISION OF CONSUMER ADVOCACY, DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS ("Consumer Advocate") and SPRINT COMMUNICATIONS COMPANY, L.P. ("Sprint") (collectively, "Parties"). See Order No. 34097 Initiating Investigation, filed on November 4, 2016 ("Order No. 34097").

pursuant to the request for services issued on January 30, 2017 ("RFS").2

I.

Background

By Order No. 34097, the commission commenced this proceeding to investigate the availability of experienced providers of quality TRS and to select the best qualified provider of TRS for the Service Period, pursuant to Hawaii Revised Statutes ("HRS") § 269-16.6.

As part of the investigation, and pursuant to Order No. 34097, the RFS was posted on the State's Procurement Notice System on January 30, 2017, inviting all interested parties to submit a proposal in accordance therewith. All proposals submitted in response to the RFS were required to be postmarked by March 6, 2017.

The commission received a proposal from Sprint within the time allotted in the RFS (i.e., postmarked by March 6, 2017). The RFS evaluation committee, which was formed to assist in

2016-0365

²Sprint is the incumbent provider of TRS in the State. See Decision and Order, issued on April 15, 2011, in Docket No. 2010-0302 ("2010-0302 Order"), which reflects the commission's selection of Sprint as the exclusive provider of TRS in the State, for the service period commencing July 1, 2011, to June 30, 2014. In accordance with the 2010-0302 Order, a contract was executed, and the option to renew Sprint's service from July 1, 2014, to June 30, 2017, was later exercised.



Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

News Media Information 202-418-0500 Internet: http://www.foc.gov TTY: 1-888-835-8322

DA 13-1530

Released: July 8, 2013

NOTICE OF CERTIFICATION OF STATE TELECOMMUNICATIONS RELAY SERVICES (TRS) PROGRAMS

CG DOCKET NO. 03-123

The Federal Communications Commission's (FCC or Commission) Consumer and Governmental Affairs Bureau (Bureau) hereby grants certification to the state telecommunication relay services (TRS) programs listed below, pursuant to Title IV of the Americans with Disabilities Act (ADA), 47 U.S.C. § 225(f)(2), and section 64.606(b) of the Commission's rules. On the basis of the state applications received, the Bureau has determined that:

- The TRS programs of the listed states meet or exceed all operational, technical, and functional minimum standards contained in section 64.604 of the Commission's rules.³
- (2) The TRS programs of the listed states make available adequate procedures and remedies for enforcing the requirements of their state programs;⁴ and
- (3) The TRS programs of the listed states in no way conflict with federal law.

The Bureau also has determined that, where applicable, the intrastate funding mechanisms of the listed states are labeled in a manner that promotes national understanding of TRS and does not offend the public, consistent with section 64.606(d) of the Commission's rules.³

Because the Commission may adopt changes to the rules governing relay programs, including state relay programs, the certification granted herein is conditioned on a demonstration of ongoing compliance with any additional new rules that are adopted by the Commission. The Commission will provide guidance to the states, as needed, to ensure compliance with such rule changes.

This certification, as conditioned herein, shall remain in effect for a five (5) year period, beginning July 26, 2013, and ending July 25, 2018, pursuant to 47 C.F.R. § 64.606(c). One year prior to the expiration of this certification, July 25, 2017, the states may apply for renewal of their TRS program

¹ For purposes of this proceeding, the term "state" refers to states, U.S. territories, and the District of Columbia, where applicable.

^{2 47} C.F.R. § 64.606(b).

^{3 47} U.S.C. § 225(f)(2)(A); 47 C.F.R. § 64.604.

^{4 47} U.S.C. § 225(f)(2)(B).

^{5 47} C.F.R. § 64.606(d).

certification by filing documentation in accordance with the Commission's rules, pursuant to 47 C.F.R. §§ 64.606(a) and (b).

STATES APPROVED FOR CERTIFICATION

File No: TRS-46-12

Alabama Public Service Commission

State of Alabama

File No: TRS-47-12

Arkansas Deaf and Hearing Impaired

State of Arkansas

File No: TRS-32-12

California Public Utilities Commission

State of California

File No: TRS-48-12

Connecticut Department of Public Utility

State of Connecticut

File No: TRS-49-12 Public Service Commission

District of Columbia

File No: TRS-51-12

Georgia Public Service Commission

State of Georgia

File No: TRS-43-12

Idaho Public Service Commission

State of Idaho

File No: TRS-08-12

Indiana Telephone Relay Access Corporation Iowa Utilities Board

State of Indiana

File No: TRS-07-12

Kansas Relay Services, Inc.

State of Kansas

File No: TRS-13-12

Louisiana Relay Administration Board

State of Louisiana

File No: TRS-33-12

Telecommunications Access of Maryland

State of Maryland

File No: TRS-19-12 Department of Commerce

State of Alaska

File No: TRS-02-12

Commission for the Deaf and Hard of Hearing

State of Arizona

File No: TRS-23-12

Colorado Public Utilities Commission

State of Colorado

File No: TRS-35-12

Delaware Public Service Commission

State of Delaware

File No: TRS-50-12

Florida Public Service Commission

State of Florida

File No: TRS-22-12

Hawaii Public Utilities Commission

State of Hawaii

File No: TRS-10-12

Illinois Commerce Commission

State of Illinois

File No: TRS-03-12

State of Iowa

File No: TRS-52-12

Kentucky Public Service Commission

Commonwealth of Kentucky

File No: TRS-53-12

Maine Public Utilities Commission

State of Maine

File No: TRS-34-12

Department of Telecommunications and Energy

Commonwealth of Massachusetts

File No: TRS-54-12

Michigan Public Service Commission

State of Michigan

File No: TRS-55-12

Mississippi Public Service Commission

State of Mississippi

File No: TRS-56-12

Telecommunications Access Program

State of Montana

File No: TRS-25-12 Rolay Novada State of Nevada

File No: TRS-45-12

New Jersey Board of Utilities

State of New Jersey

File No: TRS-16-12

New York State Department of Public Service Department of Health and Human Service

State of New York

File No: TRS-12-12

Information Technology Department

State of North Dakota

File No: TRS-57-12

Oklahoma Telephone Association

State of Oklahoma

File No: TRS-58-12

Pennsylvania Bureau of Consumer Services

Commonwealth of Pennsylvania

File No: TRS-59-12

Division of Public Utilities and Carriers

State of Rhode Island

File No: TRS-11-12

South Carolina Office of Regulatory Staff

State of South Carolina

File No: TRS-20-12

Tennessee Regulatory Authority

State of Tennessee

File No: TRS-39-12

Minnesota Department of Commerce

State of Minnesota

File No: TRS-15-12

Missouri Public Service Commission

State of Missouri

File No: TRS-40-12

Nebraska Public Service Commission

State of Nebraska

File No: TRS-42-12

New Hampshire Public Service Commission

State of New Hampshire

File No: TRS-14-12

Commission for the Deaf and Hard of Hearing

State of New Mexico

File No: TRS-30-12

State of North Carolina

File No: TRS-37-12

Public Utilities Commission of Ohio

State of Ohio

File No: TRS-36-12

Oregon Public Utilities Commission

State of Oregon

File No: TRS-28-12

Telecommunications Regulatory Board

Puerto Rico

File No: TRS-62-12

Micronesian Telecommunications Corporation

Saipan

File No: TRS-60-12

Department of Human Services

State of South Dakota

File No: TRS-17-12

Texas Public Utility Commission

State of Texas

File No: TRS-61-12

Virgin Islands Public Service Commission

U.S. Virgin Islands

File No: TRS-44-12

Vermont Department of Public Service

State of Vermont

File No: TRS-27-12

Office of the Deaf and Hard of Hearing

State of Washington

File No: TRS-01-12

Wisconsin Department of Administration

State of Wisconsin

File No: TRS-09-12 Public Service Commission

State of Utah.

File No: TRS-04-12

Department for the Deaf and Hard of Hearing

Commonwealth of Virginia

File No: TRS-06-12

Public Service Commission of West Virginia

State of West Virginia

File No: TRS-18-12

Division of Vocational Rehabilitation

State of Wyoming

The full text of this Public Notice and filings will be available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW., Room CY-A257, Washington, DC 20554. This document and copies of subsequently filed documents in this matter may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW., Room CY-B402, Washington, DC 20554. Customers may contact BCPI at their website: www.bcpiweb.com or call (202) 488-5300. Filings may also be viewed on the Commission's Electronic Comment Filing System (ECFS) at http://apps.fcc.gov/ecfs// (insert docket No. 03-123 in the proceeding number fill-in block, and the state identification number, (e.g., TRS-46-12) assigned for that specific state application in the bureau identification number fill-in block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This Public Notice can also be downloaded in Word and Portable Document Format (PDF) at http://www.fcc.gov/encyclopedia/telecommunications-relay-services-trs.

For further information regarding this *Public Notice*, contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disabilities Rights Office, (202) 418-2247 (voice), or e-mail Dana. Wilson@ifcc.gov.